

Direct Dial - (215) 592-6995

Dept. Fax# - (215) 592-3310

EPA Region 5 Records Ctr.



340146

March 7, 1994



Via Federal Express

Mr. Tom Barounis, Remedial Project Manager
United States Environmental Protection Agency
Region V
Office of Superfund
Minnesota/Ohio Remedial Response Branch (HSRM-6J)
77 West Jackson Blvd.
Chicago, Illinois 60604-3590

**RE: Response to General Notice of Potential Liability for the Stickney
Avenue Landfill and the Tyler Street Dump Sites in Toledo, Ohio**

Dear Mr. Barounis:

This is in response to EPA's General Notice of Liability directed to Rohm and Haas Company ("RH") regarding the above-referenced sites. To the best of our knowledge, RH did not generate or arrange for disposal or transportation, any hazardous substances at the sites. It appears that EPA has contacted RH in this matter in connection with its wholly-owned subsidiary, Plaskon Electronic Materials which had a Toledo facility located at 2829 Glendale Ave.

By way of reply, we refer you to RH counsel's response to EPA's Request for Information about the above-referenced sites (enclosed for your review). As stated there, RH did not own, operate or have any relation to Plaskon during the time the sites were operating and accepting industrial waste (i.e., 1950's to 1970's). In fact, RH had no relationship to Plaskon until 1984 when RH acquired Plaskon, including the Plaskon Toledo facility (which is now closed,) from Plaskon Holding Corporation.


The Toledo facility was owned by Allied Chemical Corporation ("Allied") from 1953 to 1979 when Allied sold it to Plaskon Holding Company (and the enclosed 104(e) response includes Allied's Eckhardt survey responses and other waste information concerning the Plaskon Toledo facility during that time period). Allied had purchased it from Libby-Owens-Ford Glass Company, who owned it since 1943. We have no information as to Plaskon's use of the Stickney Avenue Landfill or the Tyler Street Dump sites at such times.

U.S.E.P.A.
Tom Barounis

March 7, 1994
Page Two

Based on the foregoing, RH has no responsibility or involvement with the sites or response activity at the sites. If you have any questions or additional information, please feel free to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "Audrey C. Friedel". The signature is fluid and cursive, with the first name being the most prominent.

Audrey C. Friedel
Of Counsel

ACF/
Enclosure

cc: Allied Chemical Corporation, Inc.
c/o Allied-Signal, Inc., General Counsel Chemicals: Stanley R. Stevinson

Libby Owens Ford Glass Co.
c/o Trinova Corporation General Counsel James E. Kline and
Libby Owens Ford Co. General Counsel
Alan J. Miller

Plaskon Holding Co.
c/o Managing Director of Hillside Capital, Inc.,
(Enclosure: copy of General Notice of Potential Liability)



E. L
7-18-95

Public Record FinderSM and DOX[®]

Corporate certificates and copies of filings •
UCCs, liens and judgments • Partnership filings •
Bankruptcies • Real property deeds • Business
name filings • Civil and criminal litigation

RECEIVED
JUL 25 1995
**SUPERFUND PROGRAM
MANAGEMENT BRANCH**

Attention: Marsha Adams Date: 7-18-95

Order Number: 4268 Number of pages attached: _____

Subject Name: Plaskon Products, Inc. & Plaskon Electronic Materials, Inc.

Jurisdiction Searched: Michigan Dept. of Commerce

Attached please find the information you requested from INFORMATION AMERICA.
It was our pleasure to be of service.

If you have any questions regarding your order, please call our INFORMATION AMERICA
specialists at 1-800-532-9876 and reference the order number above.

Comments: Order: One Good Standing for each.
Original documents and all amendments for each.
One Certificate of fact listing all docs. filed.
Because Plaskon Products, Inc. was not in Good
Standing, you were given a Cert. of Fact Stating why.

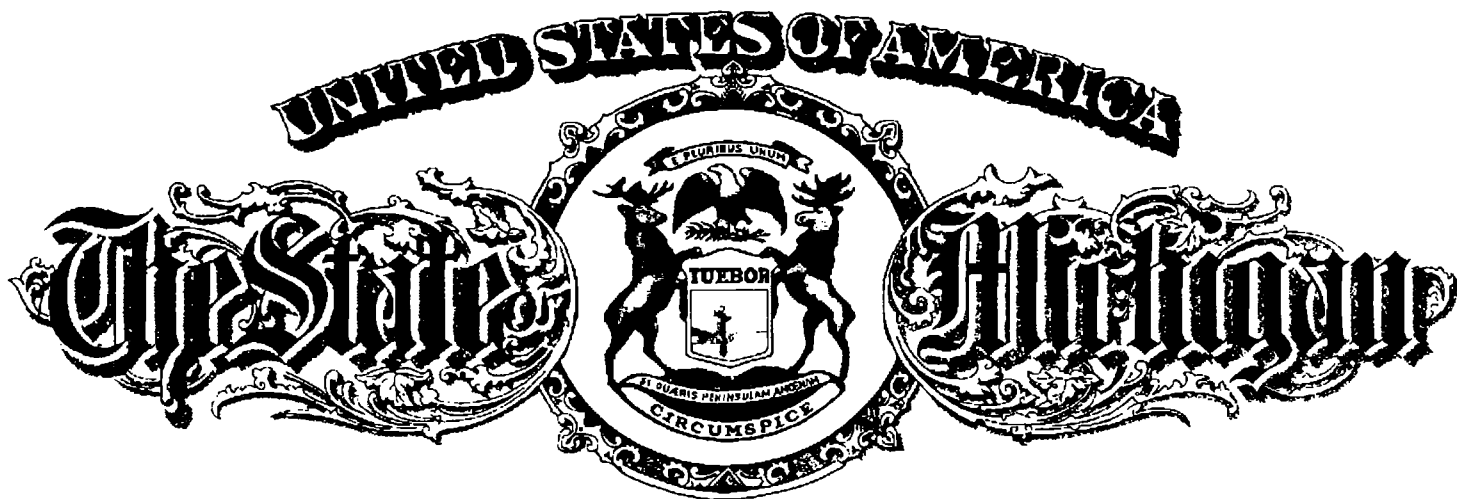
Delivery Options:

FAX • Express Courier • Priority Mail

Phone: 800-532-9876

FAX: 800-845-6319

One Georgia Center • 600 W. Peachtree Street, N.W. • Atlanta, GA • 30308



Michigan Department of Commerce

Lansing, Michigan

This is to Certify That

PLASKON ELECTRONIC MATERIALS, INC.

a DELAWARE profit corporation, was validly authorized on March 15, 1991, to transact business or conduct affairs in Michigan, and that said corporation holds a valid certificate of authority to transact business or conduct affairs in this State.

This certificate is issued to attest to the fact that the corporation is in good standing in this office as of this date and is duly authorized to transact business or conduct affairs in Michigan and for no other purpose. It is in the usual form, made by me as the proper officer, and is entitled to have full faith and credit given it in every court and office within the United States.

In testimony whereof, I have hereunto set my hand and affixed the Seal of the Department, in the City of Lansing, this 18th day of July, 1995.

Carl L. Lipp , Director
Corporation & Securities Bureau

MICHIGAN DEPARTMENT OF COMMERCE — CORPORATION AND SECURITIES BUREAU	
(FOR BUREAU USE ONLY)	Date Received
FILED	MAR 14 1991
MAR 15 1991	
Administrator MICHIGAN DEPARTMENT OF COMMERCE Corporation & Securities Bureau	
CORPORATION IDENTIFICATION NUMBER	6 3 2 - 0 5 4

APPLICATION FOR CERTIFICATE OF AUTHORITY TO TRANSACT BUSINESS OR CONDUCT AFFAIRS IN MICHIGAN

For use by Foreign Corporations

(Please read information and instructions on last page)

Pursuant to the provisions of Act 284, Public Acts of 1972 (profit corporations), or Act 162, Public Acts of 1982 (nonprofit corporations), the undersigned corporation executes the following Application:

1. The name of the corporation is:

PLASKON ELECTRONIC MATERIALS, INC. ✓

2. (Complete this item only if the corporate name in item 1 is not available for use in Michigan)

The assumed name of the corporation to be used in all its dealings with the Bureau and in the transaction of its business or the conduct of its affairs in Michigan is:

N/A

3. It is incorporated under the laws of Delaware. The date of its incorporation is September 11, 1980, and the period of its duration (corporate term) is perpetual.

4.a. The address of the main business or headquarters office of the corporation is:

c/o Rohm & Haas Company, Independence Mall West, Philadelphia, Pennsylvania 19105

(Street Address)

(City)

(State)

(ZIP Code)

b. The mailing address if different than above is:

(Street Address)

(City)

(State)

(ZIP Code)

5. The address of its registered office in Michigan is: c/o THE CORPORATION COMPANY,
615 GRISWOLD STREET DETROIT Michigan 48226
(Street Address) (City) (ZIP Code)
and the name of the resident agent at the registered office is:
THE CORPORATION COMPANY
The resident agent is an agent of the corporation upon whom process against the corporation may be served.

6. The specific business or affairs which the corporation is to transact or conduct in Michigan is as follows:

Warehousing and distribution of goods within the state of Michigan.

The corporation is authorized to transact such business or conduct such affairs in the jurisdiction of its incorporation.

7. (To be completed by profit corporations only)
The total authorized **SHARES** of the corporation is:
Common Shares 1,000 - par value \$ 1.00
Preferred Shares None

Signed this 21 day of February, 19 91
By S. J. Harmer
(Signature)
S.J. Harmer, Assistant Secretary
(Type or Print Name) (Type or Print Title)

(PROFIT CORPORATIONS) Franchise Fee:

first 60,000 authorized shares. \$50.00
each additional 20,000 authorized shares. \$30.00

DOCUMENT WILL BE RETURNED TO NAME AND MAILING ADDRESS INDICATED IN THE BOX BELOW. Include name, street and number (or P.O. box), city, state and ZIP code.

Name of person or organization
remitting fees:

C T CORPORATION SYSTEM
Seven Penn Center
1635 Market Street
Philadelphia, Pennsylvania 19103

C T CORPORATION SYSTEM

Preparer's name and business
telephone number:

Ann J. Williams

(215) 755-3686

INFORMATION AND INSTRUCTIONS

1. The application for certificate of authority to transact business or conduct affairs cannot be filed until this form, or a comparable document, is submitted.
2. Submit one original copy of this document. Upon filing, a microfilm copy will be prepared for the records of the Corporation and Securities Bureau. The original copy will be returned to the address appearing in the box above as evidence of filing.

Since this document must be microfilmed, it is important that the filing be legible. Documents with poor black and white contrast, or otherwise illegible, will be rejected.
3. This document is to be used pursuant to the provisions of chapter 10 of the Act by a foreign corporation for the purpose of obtaining a certificate of authority to transact business or conduct its affairs in this state. If the foreign profit corporation subsequently changes any of the information set forth in the Application for Certificate of Authority, it must file an Amended Application for Certificate of Authority to Transact Business in Michigan (form C&S-562) with the Bureau not later than 30 days after the time a change becomes effective. If a foreign nonprofit corporation amends its articles or is a party to a merger, a certified copy of the amendment or Certificate of Merger must be submitted within 60 days after the effective date.
4. Profit and nonprofit corporations - Attach to this application a certificate stating that the corporation is in good standing under the laws of the jurisdiction of its incorporation; dated no earlier than 30 days prior to the date of receipt in this office. The certificate must be executed by the official of the jurisdiction having custody of corporate records.
5. Nonprofit corporations only — Attach to this application a copy of the articles of incorporation and all amendments thereto certified by the proper officer of the jurisdiction of incorporation.
6. Item 2 — A foreign corporation whose true name is not available for use in Michigan is permitted to apply for a certificate of authority under an assumed name which is available for use. Item 2 of the application for certificate of authority to transact business or conduct affairs in Michigan is to be completed for this purpose only. Corporations may also transact business or conduct affairs under other assumed names by filing separate certificates of assumed name.
7. Item 6 — This item should state only the specific activities or affairs to be conducted in Michigan. An all purpose activities statement is not permitted.
8. The application must be signed in ink by an authorized officer or agent of the corporation.
9. This document is effective on the date indorsed "Filed" by the Bureau. A later effective date, no more than 90 days after the date of delivery, may be stated.
10. FEES: (Make remittance payable to State of Michigan)

Profit Corporations
Nonrefundable Fee. \$10.00
Minimum Franchise Fee. \$50.00
TOTAL Admittance Fees. \$60.00

Nonprofit Corporations
Filing Fee. \$10.00
Franchise Fee. \$10.00
TOTAL Admittance Fees. \$20.00

11. Mail form and fee to: Michigan Department of Commerce, Corporation and Securities Bureau, Corporation Division, P.O. Box 30054, 6546 Mercantile Way, Lansing, Michigan 48909, Telephone: (517) 334-8302

State of Delaware

FILED

MAR 1 1991

MICHIGAN DEPT. OF COMMERCE
CORPORATION & SECURITIES BUREAU

MAR 15 1991

Administrator
MICHIGAN DEPARTMENT OF COMMERCE
Corporation & Securities Bureau

Office of Secretary of State

I, MICHAEL HARKINS, SECRETARY OF STATE OF THE STATE OF DELAWARE DO HEREBY CERTIFY PLASKON ELECTRONIC MATERIALS, INC. IS DULY INCORPORATED UNDER THE LAWS OF THE STATE OF DELAWARE AND IS IN GOOD STANDING AND HAS A LEGAL CORPORATE EXISTENCE SO FAR AS THE RECORDS OF THIS OFFICE SHOW, AS OF THE DATE SHOWN BELOW.

AND I DO HEREBY FURTHER CERTIFY THAT THE ANNUAL REPORTS HAVE BEEN FILED TO DATE.

AND I DO HEREBY FURTHER CERTIFY THAT THE FRANCHISE TAXES HAVE BEEN PAID TO DATE.

* * * * *



721070153

Michael Harkins
Michael Harkins, Secretary of State

AUTHENTICATION:

*2981021

DATE:

03/11/1991



CT System

932AW5425 0506 DRG&FI \$52000.00

May 5, 1993

CT Corporation System
1633 Broadway
New York, NY 10019
212 246 5070

Thomas Pierson, Deputy Director
Michigan Department of Commerce
Corporation & Security Bureau
6546 Mercantile Way
Lansing, Michigan 48909

MAY 06 1993

FILED

MAY 14 1993

Administrator
MICHIGAN DEPARTMENT OF COMMERCE
Corporation & Securities Bureau

RE: CHANGE OF REGISTERED OFFICE ADDRESS

Dear Mr. Pierson,

This letter is to certify that The Corporation Company has changed its address from: 615 Griswold Street, Detroit, Michigan 48226 to: 30600 Telegraph Road, Bingham Farms, Michigan 48025. We will notify all active corporations for which The Corporation Company is the resident agent of this change of address.

Enclosed is our check for \$52,000.00 to cover the filing fee for the 10,294 active profit and non-profit corporations for which your records indicate The Corporation Company is agent. This payment will include the fee for providing us with an alphabetical listing of the names of all the corporations for which the registered office has been changed. Also included in this payment is the fee for a clean-up list which we will request within 30 days of the filing.

Please confirm in writing the date that this change was effectuated on your records.

Thank you in advance for your cooperation in this matter.

Carl L. Zygmunt

CORPORATION AND SECURITIES BUREAU

Very truly yours,

Kenneth J. Uva

Kenneth J. Uva
Vice President

KJU:mh
encl.

Sworn before me this 5th day of May, 1993.

THERESA ALFIERI
Notary Public, State of New York
No. 4703698
Qualified in Kings County
Certificate Filed in New York County
Commission Expires Dec. 31, 1993

Theresa Alfieri

0526 4815 025526

COMPLETE BOTH SIDES

Identification Number

632054

9348#5234 0510 P-MAR \$15.00
 9348#5234 0510 QPG&FI \$10.00
 FOR BUREAU USE ONLY

REQUIRED BY SECTION 911, PUBLIC ACTS OF 1972, FAILURE TO FILE THIS REPORT MAY RESULT IN THE AUTOMATIC
 REVOCATION OF THE CORPORATION'S CERTIFICATE OF AUTHORITY TO TRANSACT BUSINESS IN MICHIGAN

This Report must be filed on or before May 15, 1995

If the Resident Agent or Registered Office has changed, enter the
 corrections below and add \$5.00 to the \$15.00 filing fee. Make
 remittance payable to the State of Michigan.

1. Corporate Name

PLASKON ELECTRONIC MATERIALS, INC.
 C/O ROHM & HAAS COMPANY
 INDEPENDENCE MALL WEST
 PHILADELPHIA PA 19105

1a. Main business office address if changed. Remit an additional \$10.00
 if this item is completed.

100 INDEPENDENCE MALL WEST
 PHILADELPHIA, PA 19106

2. Resident Agent

THE CORPORATION COMPANY

2a. Resident Agent if different than 2

3. Registered Office Address in Michigan - NO., STREET, CITY, ZIP

30600 TELEGRAPH ROAD
 BINGHAM FARMS 48025

3a. Address of registered office if different than 3 - NO., STREET, CITY, ZIP

The corporation states that the address of its registered office and the
 address of the business office of its resident agent are identical. Any
 changes were authorized by resolution duly adopted by its board of
 directors.

FOR BUREAU USE ONLY

FILED BY DEPARTMENT MAY 19 95

4. Federal Employer Number

34-1326333

5. The Act Under Which Incorporated

GENERAL CORPORATION LAW OF DELAWARE PERPETUAL

6. Term of Existence (If not perpetual)

7. State of Incorporation

DE

8. Date of Admittance

03/15/1991

Date of Incorporation

9/11/80

9. State the nature and type of business in which the corporation is engaged:

MANUFACTURE + SALE OF EPOXY MOLDING COMPOUNDS

10. Total Authorized Shares

1,000,000

11. Single Business Tax Apportionment Percentage (Complete the enclosed worksheet and remit any additional admittance fees due in addition to the \$15.00 filing fee for the report.)

Most recent 6.3126 % for year ending 1993

Previous attributable shares 50.000

Previous period 4.980 % for year ending 1992

12. Corporate Officers and Directors (Name, Street Address, City, State, ZIP Code)

President

Vice President

Secretary

SEE ATTACHED

Treasurer

Director

Director

Director

REPORT MUST BE SIGNED IN INK. If the Resident Agent or Registered Office is changed, this report must be SIGNED IN INK by either the President, Vice-President, Chairperson, Vice-Chairperson, Secretary, or Assistant Secretary of the corporation. Except, if only the registered office is changed, this report may be signed by the Resident Agent.

Signature of Authorized Officer or Agent

S.J. HARMER

Title

ASST. SECRETARY

Date

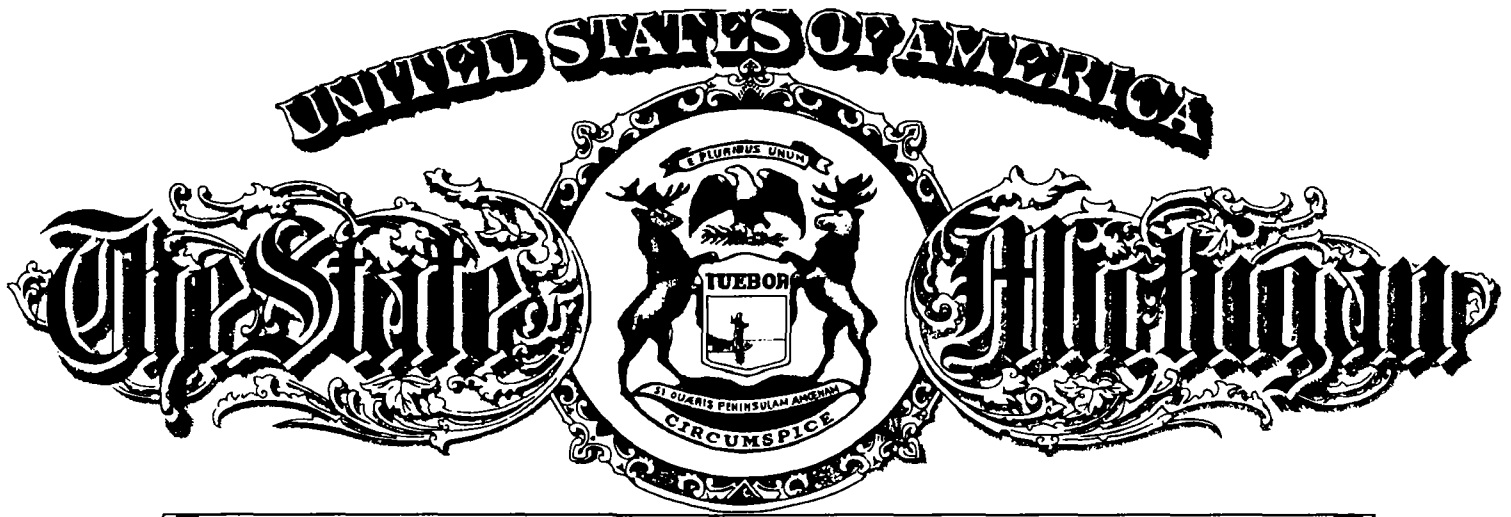
4-27-95

Preparer's Name

MAY 10 1995

Daytime Telephone Number

(215) 592-2884



Michigan Department of Commerce

Lansing, Michigan

This is to Certify That

PLASKON PRODUCTS, INC., a Delaware profit corporation, was authorized to transact business in Michigan on June 13, 1979.

I FURTHER CERTIFY that the Certificate of Authority of the corporation to transact business in this State was revoked on May 15, 1984, pursuant to the provisions of Section 922(2), Act 284, Public Acts of 1972, as amended.

This certificate is in due form, and made by me as the proper officer, and is entitled to have full faith and credit given it in every court and office within the United States.

*In testimony whereof, I have hereunto set my
hand and affixed the Seal of the Department, in
the City of Lansing, this 18th day
of July, 1995.*

Carl L. Lysor Director
Corporation and Securities Bureau

(For Use by Foreign Corporations)

609 105

APPLICATION FOR CERTIFICATE OF AUTHORITY TO TRANSACT BUSINESS IN MICHIGAN

Pursuant to the provisions of Section 1015, Act 284, Public Acts of 1972, as amended, the undersigned corporation hereby applies for authority to transact business in Michigan, and for that purpose submits the following:

1. The name of the corporation is Plaskon Products, Inc.

2. Do not complete Item 2 unless the corporate name is not available for use in Michigan. (See part 2 of Instructions)

The assumed name of the corporation to be used in all its dealings with the Michigan Department of Commerce and in the conduct of its affairs in Michigan is

3. It is incorporated under the laws of the State of Delaware

4. The date of its incorporation is April 4, 1979

5. The period of its duration is perpetual

6. The address of the main business or headquarters office of the corporation is

c/o Wm. Sword & Co. Incorporated, 22 Chambers Street, Princeton, NJ 08540
(No and Street) (Town or City) (State) (Zip Code)

The mailing address is (need not be completed unless different from the above address):

(No and Street) (Town or City) (State) (Zip Code)
7. The address of the registered office in Michigan is c/o The Corporation Company
615 Griswold Street Detroit Michigan 48226
(No and Street) (Town or City) (State) (Zip Code)

and the name of the resident agent at such address is THE CORPORATION COMPANY

Said resident agent is an agent of the corporation upon whom process against the corporation may be served.

8. The business which the corporation is to transact in Michigan is as follows: (specific business purposes required)

The manufacture, sale and distribution of molding components; To engage
in the thermosets business.

9. The business that the corporation proposes to transact in Michigan is a business that it is authorized to transact in its jurisdiction of incorporation.

10. The authorized capital stock of said corporation is

(1) {	Preferred shs. <u>5,000</u>	}	Par Value \$ <u>.10</u>	}	per share
	Common shs. <u>5,000</u>		Par Value \$ <u>.10</u>		

and/or (2). shares of no par value { Preferred --
Common --

11. Attached to this Application is a copy of the articles of incorporation and all amendments thereto, certified by the proper officer of the jurisdiction of incorporation. Also attached to this Application is a certificate setting forth that the corporation is in good standing under the laws of the jurisdiction of its incorporation, executed by the proper official thereof and dated not earlier than 30 days prior to the date of the filing of this Application.

PLASKON PRODUCTS, INC.

Signed this 22nd day of May, 19 79 BY

C. Barnwell Straut
(Signature of President, Vice-President, Chairman or Vice-Chairman)

C. Barnwell Straut, President
(Type or Print Name and Title)

MICHIGAN DEPARTMENT OF COMMERCE — CORPORATION AND SECURITIES BUREAU

Date Received

JUN 6 1979

FILED
Michigan Department of Commerce

JUN 13 1979

William J. McLaughlin
DIRECTOR

C&S-151 (Rev. 10/74)

INFORMATION AND INSTRUCTIONS

Application for Certificate of Authority

1. This Application may be used by both profit and non-profit corporations.
2. Section 212(2), Act 284, P.A. of 1972, as amended, permits a foreign corporation whose name is not available for use in Michigan to apply for a certificate of authority under an assumed name which is available for use. Item 2 of the Application for Certificate of Authority to Transact Business in Michigan is to be completed for this purpose only. Other corporations may transact business under assumed names by filing a separate Certificate of Assumed Name pursuant to the provisions of Section 217, Act 284, P.A. of 1972, as amended.
3. The Application is required to be signed in ink by the chairman or vice-chairman of the board, or by the president or vice-president.
4. One copy of the Application, a certified copy of the articles of incorporation with all amendments thereto, and a certificate of good standing are required.
5. An effective date, not later than 90 days subsequent to the date of filing, may be stated in the Application.

6. FEES — Profit Corporations:

Filing Fee	\$10.00
Franchise Fee	\$25.00
TOTAL Admittance Fees	\$35.00

FEES — Non-Profit Corporations:

Filing Fee	\$10.00
Franchise Fee	\$10.00
TOTAL Admittance Fees	\$20.00

(Make fee payable to State of Michigan)

7. Mail forms and fees to:

Michigan Department of Commerce
Corporation and Securities Bureau
Corporation Division
P.O. Drawer C
Lansing, Michigan 48904



State of DELAWARE

Office of SECRETARY OF STATE

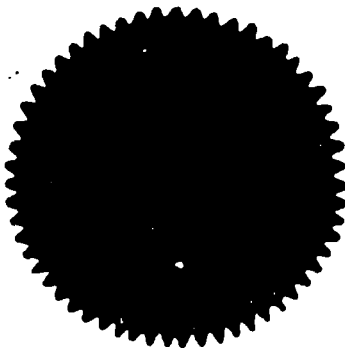
I, Glenn C. Kenton Secretary of State of the State of Delaware,
do hereby certify that the Certificate of Incorporation of the "THERMOSETS
TECHNOLOGY, INC.", was received and filed in this office the fourth day of April,
A.D. 1979, at 10 o'clock A.M.

And I do hereby further certify that the said "THERMOSETS TECHNOLOGY, INC.", filed
a Certificate of Amendment Before Payment of Capital, changing its corporate
title to "PLASKON PRODUCTS, INC." on the thirty-first day of May, A.D. 1979, at
10 o'clock A.M.

And I do hereby further certify that the aforesaid Corporation is duly
incorporated under the laws of the State of Delaware and is in good standing and
has a legal corporate existence so far as the records of this office show and is
duly authorized to transact business.

And I do hereby further certify that the said "PLASKON PRODUCTS, INC.", is
the last known title of record of the aforesaid Corporation.

In Testimony Whereof, *I have hereunto set my hand*
and official seal at Dover this thirty-first *day*
of May *in the year of our Lord*
one thousand nine hundred and seventy-nine.



Glenn C. Kenton

Glenn C. Kenton, Secretary of State

O. Evans Denney

O. Evans Denney, Assistant Secretary of State

RECEIVED

JUN 6 1979

MICHIGAN DEPT. OF COMMERCE

FILED

Michigan Department of Commerce

JUN 13 1979

Archie M. Kuylenstierna
DIRECTOR

CERTIFICATE OF INCORPORATION

OF

THERMOSETS TECHNOLOGY, INC.

THE UNDERSIGNED, in order to form a corporation for the purposes herein stated, under and pursuant to the provisions of the General Corporation Law of the State of Delaware, hereby certifies as follows:

FIRST: The name of the corporation is THERMOSETS TECHNOLOGY, INC. (hereinafter called the "Corporation").

SECOND: The registered office of the Corporation in the State of Delaware is to be located at 100 West Tenth Street, in the City of Wilmington, in the County of New Castle, in the State of Delaware. The name of its registered agent at such address is The Corporation Trust Company.

THIRD: The purpose of the Corporation is to engage in any lawful act or activity for which corporations may be organized under the General Corporation Law of Delaware.

FOURTH: The total number of shares of all classes of stock which the Corporation shall have authority to issue is Ten Thousand (10,000) shares, of the par value of ten cents (\$.10) per share, all of which shall be divided into two classes: Preferred Stock, to consist of 5,000 shares, and Common Stock, to consist of 5,000 shares.

The Preferred Stock may be issued from time to time in any manner permitted by law, in one or more series, as determined from time to time by the Board of Directors and stated in the resolution or resolutions providing for the issue of such stock. All shares of the Preferred Stock

shall be identical except as to the following relative rights and preferences, in respect of any or all of which there may be variations between different series:

(a) The rate of dividends, whether or not the holders of such shares shall be entitled to cumulative dividends, the conditions upon which dividends shall be payable, and the times of payment and the dates from which dividends shall be accumulative, and the extent of other participation rights, if any.

(b) The price at and the terms and conditions on which shares may be redeemed.

(c) The rights, preferences and amounts payable in respect of such shares in the event of any voluntary or involuntary liquidation, dissolution or winding up of the affairs of the Corporation.

(d) Sinking-fund provisions for the redemption or purchase of shares.

(e) The terms and conditions and the date or dates on which convertible shares may be converted into shares of Common Stock.

(f) The voting rights, if any, of such shares including any right to vote with holders of shares of any other series or class and any right to vote as a class, either generally or as a condition to specified corporate action.

The designation of each particular series of Preferred Stock and its terms in respect of the foregoing particulars shall be fixed and determined by the Board of Directors in any

manner permitted by law and stated in the resolution or resolutions providing for the issue of stock, before any shares of such series are issued. The Board of Directors may from time to time increase the number of shares of any series of Preferred Stock already created by providing that any unissued shares of Preferred shall constitute part of such series, or any decrease (but not below the number of shares thereof then outstanding) the number of shares of any series of Preferred Stock already created by providing that any unissued shares previously assigned to such series shall no longer constitute part thereof. The Board of Directors is hereby empowered to classify any unissued Preferred Stock by fixing or altering the terms thereof in respect of the above mentioned particulars and by assigning the same to an existing or newly created series from time to time before the issuance of such stock.

FIFTH: The name and mailing address of the incorporator is:

Name:	Mailing Address:
Marjorie M. Horowitz	Battle, Fowler et al. 280 Park Avenue New York, N.Y. 10017

SIXTH: The powers of the incorporator shall terminate upon the filing of this Certificate of Incorporation. The name and mailing address of each person who is to serve as an initial director of the Corporation until his successor is elected and qualified is as follows:

Name:	Mailing Address:
C. Barnwell Straut	22 Chambers Street Princeton, N.J. 08540
Edward J. Bramson	22 Chambers Street Princeton, N.J. 08540

SEVENTH: Election of directors need not be by written ballot except to the extent provided in the By-Laws. The Board of Directors of the Corporation is authorized and empowered from time to time in its discretion:

(a) To make, alter, amend or repeal By-laws of the Corporation, except as such power may be restricted or limited by the General Corporation Law of the State of Delaware; and

(b) To authorize and cause to be executed mortgages and liens, without limit as to amount, on the real and personal property of the Corporation.

The Corporation may in its By-laws confer powers upon its directors in addition to the foregoing and in addition to the powers and authority expressly conferred upon them by the laws of the State of Delaware.

EIGHTH: The directors in their discretion may submit any contract or other transaction or act for approval or ratification by the stockholders, and any contract or other transaction or act that shall be approved or be ratified by the written consents of the holders or two-thirds of the outstanding stock of the Corporation entitled to vote with respect to such approval or ratification, or by the vote of the holders of two-thirds of the stock of the Corporation which is represented in person or by proxy at such meeting and entitled to vote thereat (provided that a lawful quorum of stockholders be there represented in person or by proxy) shall be as valid and as binding upon the Corporation and upon all of the stockholders of the Corporation, as though it had been approved or ratified by every stockholder of the Corporation.

NINTH: Whenever a compromise or arrangement is proposed between this Corporation and its creditors or any class of them and/or between this Corporation and its stockholders or any class of them, any court of equitable jurisdiction within the State of Delaware may, on the application in a summary way of this Corporation or of any creditor or stockholder thereof or on the application of any receiver or receivers appointed for this Corporation under the provisions of Section 291 of Title 8 of the Delaware Code or on the application of trustees in dissolution or of any receiver or receivers appointed for this Corporation under the provisions of Section 279 of Title 8 of the Delaware Code order a meeting of the creditors or class of creditors, and/or of the stockholders or class of stockholders of this Corporation, as the case may be, to be summoned in such manner as the said court directs. If a majority in number representing three-fourths in value of the creditors or class of creditors, and/or of the stockholders or class of stockholders of this Corporation, as the case may be, agree to any compromise or arrangement and to any reorganization of this Corporation as consequence of such compromise or arrangement, the said compromise or arrangement and the said reorganization shall, if sanctioned by the court to which the said application has been made, be binding on all the creditors or class of creditors, and/or on all the stockholders or class of stockholders of this Corporation, as the case may be, and also on this Corporation.

TENTH: The Corporation reserves the right to amend, alter, change or repeal any provision contained in this Certificate of Incorporation in the manner now or hereafter prescribed

NINTH: Whenever a compromise or arrangement is proposed between this Corporation and its creditors or any class of them and/or between this Corporation and its stockholders or any class of them, any court of equitable jurisdiction within the State of Delaware may, on the application in a summary way of this Corporation or of any creditor or stockholder thereof or on the application of any receiver or receivers appointed for this Corporation under the provisions of Section 291 of Title 8 of the Delaware Code or on the application of trustees in dissolution or of any receiver or receivers appointed for this Corporation under the provisions of Section 279 of Title 8 of the Delaware Code order a meeting of the creditors or class of creditors, and/or of the stockholders or class of stockholders of this Corporation, as the case may be, to be summoned in such manner as the said court directs. If a majority in number representing three-fourths in value of the creditors or class of creditors, and/or of the stockholders or class of stockholders of this Corporation, as the case may be, agree to any compromise or arrangement and to any reorganization of this Corporation as consequence of such compromise or arrangement, the said compromise or arrangement and the said reorganization shall, if sanctioned by the court to which the said application has been made, be binding on all the creditors or class of creditors, and/or on all the stockholders or class of stockholders of this Corporation, as the case may be, and also on this Corporation.

TENTH: The Corporation reserves the right to amend, alter, change or repeal any provision contained in this Certificate of Incorporation in the manner now or hereafter prescribed

by law, and all rights and powers conferred herein on
stockholders, directors and officers are subject to this
reserved power.

IN WITNESS WHEREOF, I have hereunto set my hand
the 3rd day of April, 1979.

Marjorie M. Horowitz
Marjorie M. Horowitz, Incorporator
Battlé, Fowler, Jaffin, Pierce & Khe
280 Park Avenue
New York, N.Y. 10017

CERTIFICATE OF AMENDMENT
OF
CERTIFICATE OF INCORPORATION
OF

THERMOSETS TECHNOLOGY, INC.

Adopted in accordance with the provisions of
Section 241 of the General Corporation Law of
the State of Delaware

We, C. Barnwell Straut, President and William E. Speers,
Jr., Secretary of THERMOSETS TECHNOLOGY, INC. (the "Corporation"),
a Corporation organized and existing under and by virtue of
the General Corporation Law of the State of Delaware,
DO HEREBY CERTIFY:

FIRST: That the Board of Directors of said Corporation,
by unanimous written consent, filed with the minutes of the
Board, duly adopted a resolution proposing and declaring
advisable the following amendment to the Certificate of
Incorporation of said Corporation:

RESOLVED, that the Certificate of
Incorporation of THERMOSETS TECHNO-
LOGY, INC. be amended by changing
the FIRST Article thereof so that,
as amended, said Article shall be
and read as follows:

"The name of the corporation is
PLASKON PRODUCTS, INC. (hereinafter
called the "Corporation").

SECOND: That the aforesaid amendment was duly adopted
in accordance with the applicable provisions of Section 241(b)
of the General Corporation Law of the State of Delaware. The
Corporation has not received any payment for any of its stock.

IN WITNESS WHEREOF, we have signed this certificate
this 20th day of May, 1979.

ATTEST.

By:

William E. Speers, Jr.
Secretary, William E. Speers, Jr.

THERMOSETS TECHNOLOGY, INC.

By

C. Barnwell Straut
President, C. Barnwell Straut



State of DELAWARE



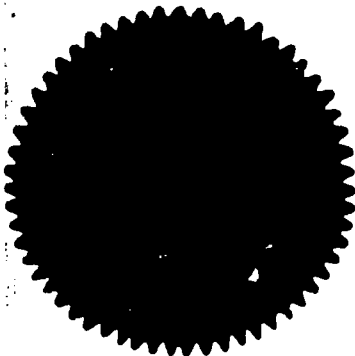
Office of SECRETARY OF STATE

I, Glenn C. Kenton Secretary of State of the State of Delaware,

do hereby certify that the above and foregoing pages numbered from 1 to 6, both numbers inclusive, is a true and correct copy of Certificate of Incorporation of the "THERMOSETS TECHNOLOGY, INC.", as received and filed in this office the fourth day of April, A.D. 1979, at 10 o'clock A.M.

And I do hereby further certify that the above and foregoing page numbered 1, is a true and correct copy of Certificate of Amendment Before Payment of Capital of the "THERMOSETS TECHNOLOGY, INC.", as received and filed in this office the thirty-first day of May, A.D. 1979, at 10 o'clock A.M..

In Testimony Whereof, *I have hereunto set my hand*
and official seal at Dover this thirty-first *day*
of May *in the year of our Lord*
one thousand nine hundred and seventy-nine.



Glenn C. Kenton

Glenn C. Kenton, Secretary of State

O. Evans Denney

O. Evans Denney, Assistant Secretary of State

RECEIVED

JUN 6 1979

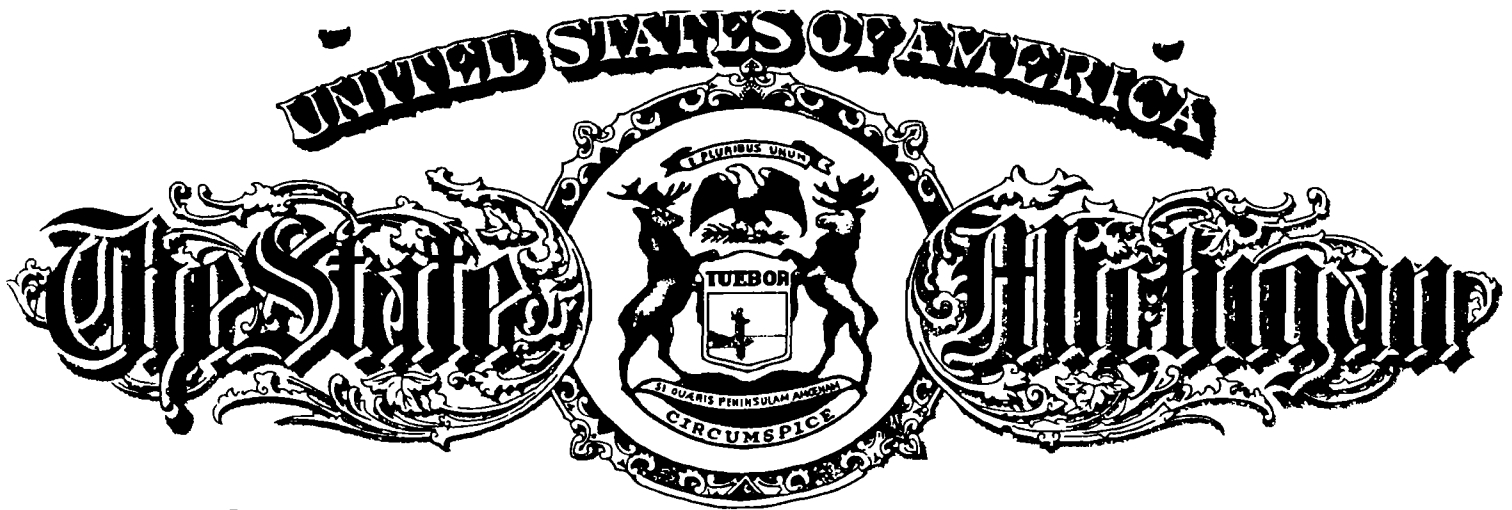
MICHIGAN DEPT. OF COMMERCE

FILED

Michigan Department of Commerce

JUN 13 1979

William W. K. [Signature]
DIRECTOR



Michigan Department of Commerce

Lansing, Michigan

This is to Certify That the Annexed Copy of
the 1 page document listing for

PLASKON ELECTRONIC MATERIALS, INC.

has been compared by me with the record on file in this Department and that
the same is a true copy thereof, and the whole of such record.

In testimony whereof, I have hereunto set my
hand and affixed the Seal of the Department, in
the City of Lansing, this 19th *day*
of July *, 19* 95 *.*

Carl L. Lysen Director
Corporation and Securities Bureau

PLASKON ELECTRONIC MATERIALS, INC., a Delaware profit corporation, filed an Application for Certificate of Authority to Transact Business or Conduct Affairs in Michigan, in this office on March 15, 1991.

I FURTHER CERTIFY that

a Certificate of Change of Resident Agent and/or Registered Office was filed on May 14, 1993.

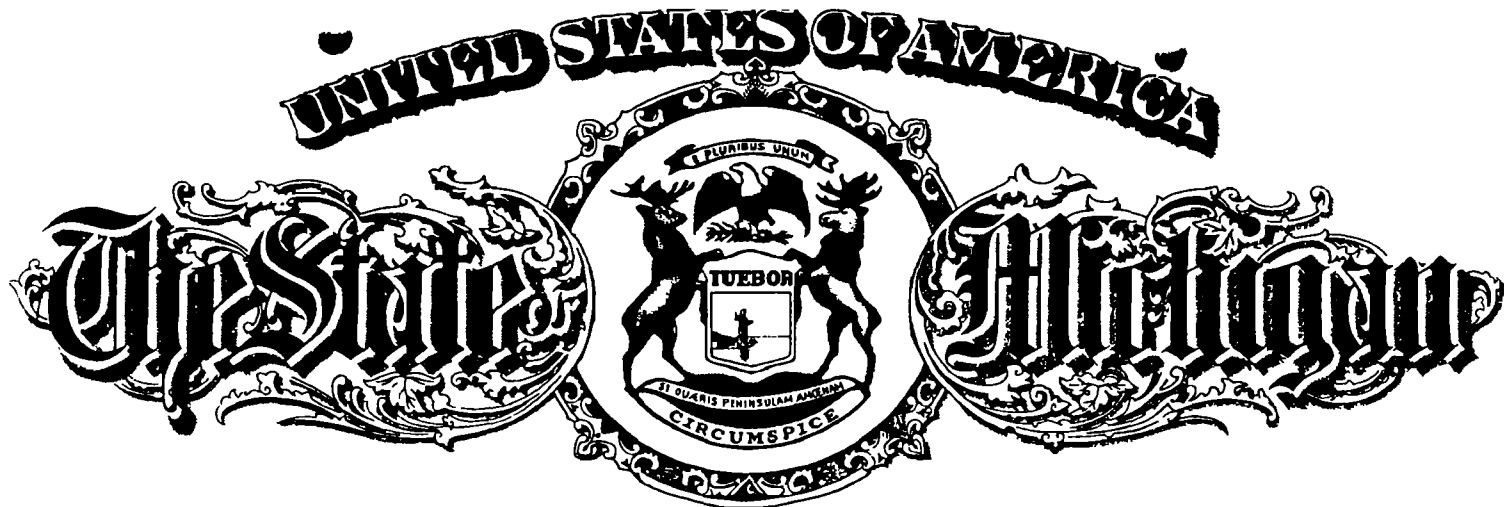
a Certificate of Change of Resident Agent and/or Registered Office was filed on May 19, 1995.

AND I FURTHER CERTIFY that the corporation has filed all annual reports and paid the fees in connection therewith up to and including the 1995 report.

AND I FURTHER CERTIFY that the above constitutes all documents on file in this office for the corporation.

AND I FURTHER CERTIFY that the corporation is in good standing in this office as of this date and is duly authorized to transact business or conduct affairs in Michigan and for no other purpose.

This certificate is in due form, made by me as the proper officer, and is entitled to have full faith and credit given it in every court and office within the United States.



Michigan Department of Commerce

Lansing, Michigan

This is to Certify That the Annexed Copy of
the 1 page document listing for

PLASKON PRODUCTS, INC.

has been compared by me with the record on file in this Department and that
the same is a true copy thereof, and the whole of such record.

In testimony whereof, I have hereunto set my
hand and affixed the Seal of the Department, in
the City of Lansing, this 19th *day*
of July *, 19 95*

Carl L. Lysen Director
Corporation and Securities Bureau

SEAL APPEARS ONLY ON ORIGINAL

PLASKON PRODUCTS, INC., a Delaware profit corporation, filed an Application for Certificate of Authority to Transact Business or Conduct Affairs in Michigan, in this office on June 13, 1979.

AND I FURTHER CERTIFY that the corporation has filed all annual reports and paid the fees in connection therewith for 1980 to 1982, and 1984.

AND I FURTHER CERTIFY that the above constitutes all documents on file in this office for the corporation.

AND I FURTHER CERTIFY that the corporation was automatically dissolved on May 15, 1984, pursuant to the provisions of Section 922(1), Act 284, Public Acts of 1972, as amended.

This certificate is in due form, made by me as the proper officer, and is entitled to have full faith and credit given it in every court and office within the United States.

UNITED STATES OF AMERICA,
STATE OF OHIO,
OFFICE OF THE SECRETARY OF STATE.

E.6
7-17-95

} RECEIVED
JUL 20 1995
SUPERFUND PROGRAM
MANAGEMENT BRANCH

I, Bob Taft, do hereby certify that I am the duly elected, qualified and present acting Secretary of State for the State of Ohio, and as such have custody of the records of Ohio and Foreign corporations and Miscellaneous filings; that said records show a FOREIGN LICENSE APPLICATION for PLASKON ELECTRONIC MATERIALS, INC., a Delaware corporation, License No. 562716, filed in this office on October 14, 1980, recorded on Roll E821, Frame 0191 of the Records of Incorporation. THE FOREGOING STATEMENT CONSTITUTES A COMPLETE LIST OF ALL CHARTER DOCUMENTS ON FILE. Said corporation, PLASKON ELECTRONIC MATERIALS, INC., a Delaware corporation, having qualified to do business within the State of Ohio on October 14, 1980, under License No. 562716, is currently in GOOD STANDING upon the records of this office.



WITNESS my hand and official
seal at Columbus, Ohio this
17th day of July, A.D. 1995

Bob Taft

Bob Taft
Secretary of State

APPLICATION FOR LICENSE

TO THE SECRETARY OF STATE, COLUMBUS, OHIO

The Applicant, a foreign corporation desiring to transact business in Ohio, pursuant to the provisions of Sections 1701.01 et seq., Revised Code of Ohio, does hereby certify as follows:

- *FIRST. Its corporate name is PLASKON PRODUCTS, INC.
- SECOND. It is a corporation organized under the laws of the State of Delaware
- THIRD. The complete address of its principal office is c/o Wm. Sword & Co.
Incorporated, 22 Chambers Street, Princeton, New Jersey 08540
- FOURTH. The name of the county and city, village or township in which the principal office within this State is to be located is Cuyahoga County,
Cleveland
- FIFTH. It hereby constitutes and appoints C T CORPORATION SYSTEM
a resident of Ohio as its agent upon whom service of process may be had in the State of Ohio. The complete address of such agent is _____
Union Commerce Building, Cleveland, Ohio 44115
- SIXTH. It hereby consents irrevocably to the service of process on such person and his successors as long as the authority of such agents shall continue as provided by the Ohio Foreign Corporation Act, and to service of process on the Secretary of State in the event such person or persons cannot be found or in any of the other events whereby such service is authorized by the Ohio Foreign Corporation Act.
- **SEVENTH. The following is a brief summary of the corporate purposes to be exercised within Ohio: The manufacture, sale and distribution of molding
components; To engage in the thermosets business together with any
other lawful activities which may be carried on by a domestic
corporation to the extent that it is authorized to do such
business in the jurisdiction of its incorporation.
- EIGHTH. The corporation ~~may~~ has not ~~(strike out words not applicable)~~ had a prior license to transact business within the State of Ohio, issued on _____, 19____ under # _____.
- NINTH. This application ~~is not made~~ ~~(strike out words not applicable)~~ to enable the corporation to prosecute or defend an action or suit the cause of which arose prior to this application.

TEN. The approximate date upon which the corporation began business in Ohio is Date when qualified

ELEVENTH. The application is made to secure a nonexclusive permanent limited and not applicable license.

TWELVE. THERE IS HEREWITH SUBMITTED A Certificate of Good Standing or existence, under the seal of the Secretary of State, or other proper official of the State under the laws of which the applicant is organized, dated not earlier than sixty days prior to the filing of this application, setting forth; (1) The exact Corporate Title; (2) The date of incorporation; (3) That the Corporation is in good standing or is a subsisting corporation.

THIRTEENTH. The corporation has currently authorized a total of 10,000 shares and has 0 shares currently issued.

IN WITNESS WHEREOF, said PLASKON PRODUCTS, INC. has caused this application to be executed by an executive officer duly authorized in the premises, this 19 day of April, 19 79.

STATE OF NEW JERSEY

COUNTY OF PASSAIC

S2.

C. Barnwell Straut, being duly sworn, says that he is (Title) President of the applicant and that the foregoing statements are true and correct according to his best knowledge and belief.

C. Barnwell Straut

Sworn to before me and subscribed in my presence this 19 day of April, 19 79.

NOTARY PUBLIC [Signature]

* If the name of the corporation is not available in Ohio and the corporation is unable to obtain consent to its use, it must insert the Trade Name under which it will do business in this State and must attach to this application a resolution of its board of directors, certified by its secretary or assistant secretary, stating that the corporation will transact business in this State only under the assumed name.

** The purpose(s) may not include any activity that could not be lawfully transacted by a domestic corporation. If the purpose is to carry on the practice of a profession, each shareholder must be licensed to practice that profession in this State.

(77 OAG 13)

LAUREL J. GARFANT
NOTARY PUBLIC OF NEW JERSEY
My Commission Expires Sept. 7, 1983



State of DELAWARE

Office of SECRETARY OF STATE

I, Glenn C. Kenton Secretary of State of the State of Delaware

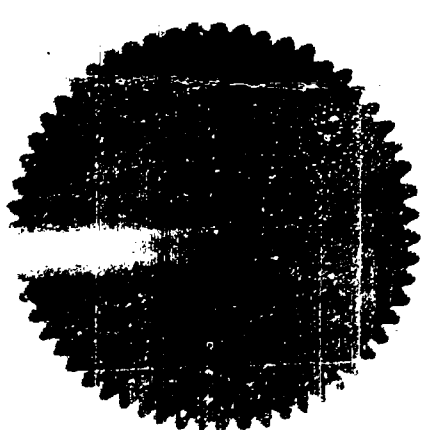
do hereby certify that the Certificate of Incorporation of the "THERMOSETS TECHNOLOGY, INC.", was received and filed in this office the fourth day of April, A.D. 1979, at 10 o'clock A.M.

And I do hereby further certify that the said "THERMOSETS TECHNOLOGY, INC.", filed a Certificate of Amendment Before Payment of Capital, changing its corporate title to "PLASKON PRODUCTS, INC." on the thirty-first day of May, A.D. 1979, at 10 o'clock A.M.

And I do hereby further certify that the aforesaid Corporation is duly incorporated under the laws of the State of Delaware and is in good standing and has a legal corporate existence so far as the records of this office show and is duly authorized to transact business.

And I do hereby further certify that the said "PLASKON PRODUCTS, INC.", is the last known title of record of the aforesaid Corporation.

In Testimony Whereof, *I have hereunto set my hand*
and official seal at Dover this thirty-first *day*
of May *in the year of our Lord*
one thousand nine hundred and seventy-nine.



Glenn C. Kenton

Glenn C. Kenton, Secretary of State

STATE OF DELAWARE

OFFICE OF SECRETARY OF STATE

I, GLENN C. KENTON, Secretary of State of the State of the Delaware, hereby certify that the Certificate of Incorporation of the "THERMUSENS TECHNOLOGY, INC.", was received and filed in this office the fourth day of April, A.D. 1984, at 10 o'clock A.M.

And I do hereby further certify that the said "THERMUSENS TECHNOLOGY, INC.", filed a Certificate of Amendment, changing its corporate title to "PLASKON PRODUCTS, INC.", on the thirty-first day of May A.D. 1979, at 11 o'clock A.M.

And I do hereby further certify that a Certificate of Change of Location of Registered Office of the companies represented by "The Corporation Trust Company", as it applies to "PLASKON PRODUCTS, INC.", was received and filed in this office the twenty-seventh day of July, A.D. 1984, at 4:30 o'clock P.M.

And I do hereby further certify that the said "PLASKON PRODUCTS, INC." filed a Certificate of Amendment, changing its corporate title to "PLM LIQUIDATING CORP.", on the thirtieth day of August A.D. 1984, at 2 o'clock P.M.

And I do hereby further certify that the aforesaid Certificates are the only Certificates on record of the aforesaid Corporation.

And I do hereby further certify that the aforesaid Corporation is duly incorporated under the laws of the State of Delaware and is in good standing and has a legal corporate existence not having been cancelled or dissolved so far as the records of this office show and is duly authorized to transact business.

And I do hereby further certify that the Annual Reports have been filed to date.

IN TESTIMONY WHEREOF, I have hereunto set

my hand and official seal at Dover this
twelfth day of September in the year of
our Lord one thousand nine hundred and
eighty-four.



Glenn C. Kenton

Glenn C. Kenton, Secretary of State

APPLICATION FOR LICENSE

TO THE SECRETARY OF STATE, COLUMBUS, OHIO

The Applicant, a foreign corporation desiring to transact business in Ohio, pursuant to the provisions of Sections 1703.01 et seq., Revised Code of Ohio, does hereby certify as follows:

*FIRST. Its corporate name is PLASKON ELECTRONIC MATERIAL, INC.

SECOND. It is a corporation organized under the laws of Delaware

THIRD. The complete address of its principal office is c/o The Corporation Trust Company, 100 West Tenth Street, Wilmington, Delaware 19801

FOURTH. The name of the county and city, village or township in which the principal office within this State is to be located is _____
Lucas County, Toledo, Ohio

FIFTH. It hereby constitutes and appoints C T CORPORATION SYSTEM
a resident of Ohio as its agent upon whom service of process may be had in the State of Ohio. The complete address of such agent is _____
Union Commerce Building, Cleveland, Ohio 44115

SIXTH. It hereby consents irrevocably to the service of process on such person and his successors as long as the authority of such agents shall continue as provided by the Ohio Foreign Corporation Act, and to service of process on the Secretary of State in the event such person or persons cannot be found or in any of the other events whereby such service is authorized by the Ohio Foreign Corporation Act.

**SEVENTH. The following is a brief summary of the corporate purposes to be exercised within Ohio: _____

to engage in the encapsulation business including but not limited to epoxy semiconductor encapsulation and to manufacture, sell, distribute and generally deal in and with products in connection therewith.

EIGHTH. The corporation ~~has~~, has not ~~had a prior license to transact business within the State of Ohio, nor does it~~ had a prior license to transact business within the State of Ohio, ~~nor does it~~

NINTH. This application ~~is not made to enable the corporation to prosecute or defend an action or suit the cause of which arose prior to this application.~~ is not made to enable the corporation to prosecute or defend an action or suit the cause of which arose prior to this application.

TENTH. The approximate date upon which the corporation began transacting business in Ohio is The Corporation will commence transacting business in Ohio upon qualification.

ELEVENTH. The application is made to secure a ~~temporary~~, permanent ~~notary~~ ~~notary public~~ license.

TWELFTH. THERE IS HEREWITH SUBMITTED A Certificate of Good Standing or subsistence, under the seal of the Secretary of State, or other proper official of the State under the laws of which the applicant is organized, dated not earlier than sixty days prior to the filing of this application, setting forth; (1) The exact Corporate Title; (2) The date of incorporation; (3) That the Corporation is in good standing or is a subsisting corporation

THIRTEENTH. The corporation has currently authorized a total of 1,000 shares and has 100 shares currently issued.

IN WITNESS WHEREOF, said PLASKON ELECTRONIC MATERIALS, INC. has caused this application to be executed by an executive officer duly authorized in the premises, this 6th day of October, 1980.

STATE OF Ohio

COUNTY OF Lucas ss.

Malcolm Riddell, being duly sworn, says that he is _____ (Title)

President of the applicant and that the foregoing statements are true and correct according to his best knowledge and belief.

Malcolm Riddell

Sworn to before me and subscribed in my presence this 6th day of October, 1980.

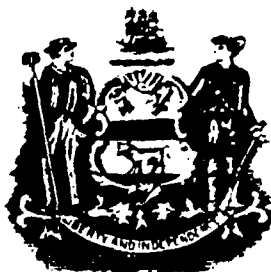
NOTARY PUBLIC

Joanne E. Rutledge
JOANNE E. RUTLEDGE
Notary Public, Lucas County, Ohio

* If the name of the corporation is not available in Ohio ~~and the corporation is unable~~ to obtain consent to its use, it must insert the Trade Name under which it will do business in this State and must attach to this application a resolution of its board of directors, certified by its secretary or assistant secretary, stating that the corporation will transact business in this State only under the assumed name.

** The purpose(s) may not include any activity that could not be lawfully transacted by a domestic corporation. If the purpose is to carry on the practice of a profession, each shareholder must be licensed to practice that profession in this State.

(77 OAG 18)



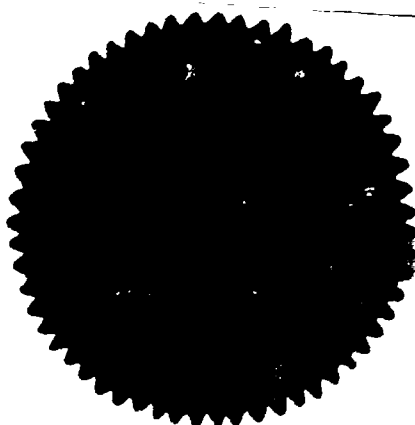
State of DELAWARE

Office of SECRETARY OF STATE

I, Glenn C. Kenton Secretary of State of the State of Delaware
do hereby certify that the Certificate of Incorporation of the "PLASKON ELECT
MATERIALS, INC.", was received and filed in this office the eleventh day of September,
A.D. 1980, at 10 o'clock A.M.

And I do hereby further certify that the aforesaid Corporation is duly
incorporated under the laws of the State of Delaware and is in good standing and
has a legal corporate existence so far as the records of this office show and is
duly authorized to transact business.

In Testimony Whereof, *I have hereunto set my hand*
and official seal at Dover this eleventh *day*
of September *in the year of our Lord*
one thousand nine hundred and eighty.



Direct Dial - (215) 592-6995
Dept. Fax# - (215) 592-3227

E.6
9/15/93



September 15, 1993

FEDERAL EXPRESS

Marsha A. Adams (5HSM-5J)
Responsible Party Search Section
United States Environmental Protection Agency
Region 5
77 West Jackson Blvd.
Chicago, Illinois 60604-3590

RE: Request for Information Pursuant to Section 104(e) of
CERCLA for the Stickney Avenue Landfill and the
Tyler Street Dump Sites in Toledo, Ohio

Dear Ms. Adams:

This is in response to EPA's Request for Information directed to Plaskon Electronic Materials regarding the above-referenced site.

Plaskon is a wholly-owned subsidiary of Rohm and Haas Company ("RH"). RH did not own, operate or have any relation to Plaskon during the time period cited in the information request (1951-1981). RH acquired Plaskon in 1984 from Plaskon Holding Corporation, at which time RH also acquired the Plaskon Toledo facility (located at 2829 Glendale Ave.), which is now closed.

The Toledo facility had been owned by Allied Chemical Corporation ("Allied") from 1953 to 1979 when Allied sold it to Plaskon Holding Company. Allied had purchased it from Libby-Owens-Ford Glass Company, who owned it since 1943. We have no information as to Plaskon's use of the Stickney Avenue Landfill or the Tyler Street Dump Sites. Enclosed for your information is a copy of our response to EPA's Request for Information concerning the Dura Landfill site, as it includes Allied's Eckhardt survey responses and other waste information concerning the Plaskon Toledo facility.

If you have any questions, please feel free to contact me. Also, kindly direct further Plaskon correspondence to me or Ellen Friedell, Esq. at the above-noted address.

Sincerely,

Audrey C. Friedel
Of Counsel

ACF/gam
Enclosure

Marsha A. Adams
September 15, 1993
Page 2.

cc: Allied Chemical Corporation, Inc. c/o Allied-Signal, Inc., General
Counsel Chemicals: Stanley R. Stevinson
Libby Owens Ford Glass Co. c/o Trinova Corporation General
Counsel James E. Kline and Libby Owens Ford Co. General Counsel
Alan J. Miller
Plaskon Holding Co. c/o Managing Director of Hillside Capital, Inc.,

Direct Dial - (215) 592-6996
Dept. Fax# - (215) 592-322



VIA FEDERAL EXPRESS

March 15, 1993

Ms. Linda Beasley
Emergency Support Section
U.S. Environmental Protection Agency, HSE-5J
77 West Jackson Boulevard
Chicago, Illinois 60604

RE: Request for Information Pursuant to Section 104(e) of
CERCLA and Section 3007 of RCRA, for the Dura Landfill
Site in Toledo, Ohio

Dear Ms. Beasley:

Enclosed is the Response of Plaskon Electronic Materials, Inc.
("Plaskon") to the EPA's Request for Information regarding the above
referenced site.

If you have any questions regarding our Response, please feel free
to contact me. Also, kindly direct further Plaskon correspondence to me,
or Ellen S. Friedell, Esq., at the above-noted address.

Sincerely,

A handwritten signature in cursive script that reads "Audrey C. Friedel".

Audrey C. Friedel
Of Counsel

ACF/gam
Enclosures

**RESPONSE OF PLASKON ELECTRONIC MATERIALS, INC.
TO EPA'S REQUEST FOR INFORMATION REGARDING
THE DURA LANDFILL SITE, TOLEDO, OHIO**

1. Identify all persons consulted in the preparation of each and every answer to these Information Requests.

Response:

Persons who Respondent had reason to believe had knowledge concerning the use of the Site, were consulted under the direction of Ellen S. Friedell, Esq. of Rohm and Haas Company ("RH"), who traveled to the Toledo, Ohio Plaskon Electronic Materials, Inc. ("Plaskon") facility (the "Toledo facility"), in connection with the City of Toledo's 1987 investigation concerning the Site .

2. Identify all documents consulted, examined, or referred to in the preparation of the answers to these Requests and provide copies of all such documents.

Response:

There has been a thorough review of the documents identified in connection with the City of Toledo's 1987 investigation concerning the Site (at which time Plaskon employees reviewed the environmental and waste files of the facility under the direction of Ellen S. Friedell, Esq. of RH who traveled to the Toledo facility.) The documents which refer to the subject of this Request are attached as follows:

- a. Instructions for Answering Questionnaires prepared by Allied Chemical Corporate Environmental Affairs and Law Departments
- b. Memorandum of June 1, 1979 from Wholf to Fitts
- c. Memorandum of May 30, 1979 from Mauter regarding Past Practices for Disposal of Waste Materials (with handwriting on it and without handwriting on it)
- d. Eckhardt Survey by Allied Chemical Corporation for its various facilities (32 pages)
- e. Three handwritten note pages of April 30, 1979 identified with the name Kratzman
- f. Interoffice Communication of June 5, 1979 to Wholf from von Harling
- g. Letter of September 26, 1973 from Findlay to Harantha
- h. Photocopy of two news articles (one page.)

- i. Memo of April 3, 1973 from Environmental Studies Committee to Chamber Board of Trustees
- j. Toledo Area Industrial Solid Waste Summary Report of Survey of April 4, 1973
- l. Toledo Operations Combustible Scrap list of June 17, 1968
- m. Undated handwritten note (one page)
- n. Letter of October 20, 1982 from Wholf to Shields
- o. Exhibit C-2 dated July 12, 1984
- p. Letter of June 8, 1984 from McKee to Bennett
- q. Toledo, Ohio Facility document numbered 450131 (eight pages)
- r. Letter of May 18, 1984 from Ferguson to Carlisle

3. If Respondent has reason to believe that there may be persons able to provide a more detailed or complete response to any Information Request or who may be able to provide additional responsive documents, identify such persons.

Response:

Allied Chemical Corporation ("Allied") or Plaskon Holding Corporation may be able to provide additional information. By way of background, Plaskon is a wholly-owned subsidiary of RH. RH acquired Plaskon (an epoxy molding business) in 1984 from Plaskon Holding Corporation, at which time RH also acquired the Toledo facility (located at 2829 Glendale Avenue). Our understanding is that the Toledo facility had been owned by Allied from 1953 to 1979, when Allied sold it to Plaskon Holding Company, and that Allied had purchased it from Libby-Owens-Ford Glass Company, who had owned it since 1943. Respondent understands that in the 1960's, when Allied owned the Toledo facility, Allied used the Dura Landfill from 1960-1965.

4. List the EPA Identification Numbers of the Respondent if applicable.

Response:

OHD094808904

5. Identify all end-products (including trade names if appropriate) produced, formulated, processed, manufactured, or otherwise created by each of Respondent's companies, subsidiaries, parent corporations, predecessors, successors, and/or other business entities that generated, used, transported, treated, stored, disposed or otherwise handled hazardous substances, pollutants or contaminants, or solid wastes that may have went to the site between 1950 and 1980. In addition, identify the following:

- a. the chemical content, characteristics and physical state (e.g., solid, liquid) of each end-product;
- b. the dates during which each end-product was produced, formulated, processed, manufactured, or otherwise created by Respondent;
- c. the quantities produced of each end-product;
- d. the manufacturing process(es) that generated each end-product. If any such manufacturing or other process has changed or been modified or altered during the period 1950 to 1980, indicate the date and manner of such change, alteration or modification;
- e. the wastes or waste byproducts created during or as a result of each of the manufacturing processes listed in the answer to subpart d) above.

Response:

Respondent and its companies, subsidiaries, parent corporations, predecessors, successors, and any other related entities did not generate, ~~use, transport, treat, store, dispose or otherwise handle~~ any hazardous substance, pollutant, contaminant or solid waste that went to the Site. By way of further answer, as to unrelated entities, see documents identified at no. 2 and see no. 3.

6. Identify all hazardous substances, pollutants or contaminants and/or solid wastes purchased, produced, formulated, processed, used, or otherwise handled by each of Respondent's companies, subsidiaries, parent corporations, predecessors, successors, and/or other business entities that generated, used, transported, treated, stored, disposed or otherwise handled hazardous substances, pollutants or contaminants, or solid wastes that may have went to the Site between 1950 and 1980. In addition, identify the following:

- a. the chemical composition, characteristics and physical state (e.g., solid, liquid) of each hazardous substance, pollutant or contaminant, or solid waste;
- b. the dates during which each hazardous substance, pollutant or contaminant, or solid waste was purchased, produced, formulated, processed, used, or otherwise handled by Respondent;

- c. the quantities of each hazardous substance, pollutant or contaminant, or solid waste;
- d. how such hazardous substances, pollutants or contaminants, or solid wastes were acquired by Respondent;
- e. the manufacturing process that generated and/or used each hazardous substance, pollutant or contaminant, or solid wastes. If any such manufacturing or other process has changed or been modified or altered during the period 1950 to 1980, indicate the date and manner of such change, alteration or modification;
- f. the wastes or waste byproducts created in association with the use of such hazardous substance, pollutant or contaminant;
- g. the storage and disposal procedures and/or methods used for such hazardous substance, pollutant or contaminant, or waste or waste byproduct identified above.

Response:

Respondent and its companies, subsidiaries, parent corporations, predecessors; successors; and any other related entities did not generate, use, transport, treat, store, dispose or otherwise handle any hazardous substance, pollutant, contaminant or solid waste that went to the Site. By way of further answer, as to unrelated entities, see documents identified at no. 2 and see no. 3.

7. Identify the acts or omissions of any person, other than Respondent's employees, contractors, or agents, that may have caused the release or threat of release of hazardous substances, pollutants, or contaminants at the Site, and damages resulting therefrom.

Response:

See documents identified at no. 2 and see no. 3.

8. Identify all persons or businesses who are or may be responsible for the liabilities of the Respondent arising from or relating to the release or threatened release of hazardous substances or materials or solid wastes at the Site, including but not limited to successors and individuals.

Response:

Respondent has no connection to the Site and therefore has no responsibility or liability relating to the Site. By way of further answer, see documents identified at no. 2 and see no. 3.

9. Identify all persons, including Respondent's employees, having knowledge or information about the generation, use, transportation, treatment, storage, disposal or other handling of materials, hazardous substances, pollutants or contaminants, or solid wastes at or to the Site by you, your contractors, or by prior owners and/operators.

Response:

See no. 3 and documents identified at no. 2.

10. Did you ever use, purchase, store, treat, dispose, transport or otherwise handle any hazardous substances or materials, or solid wastes at or to the Site? If the answer to the preceding question is anything but an unqualified "no", identify:

- a. the hazardous substance, material, or solid waste;**
- b. the chemical composition, characteristics, physical state (e.g., solid, liquid) of each hazardous substance, material, or solid waste;**
- c. who supplied you with such hazardous substance, material or solid waste;**
- d. how such hazardous substance, material or solid waste was used, purchased, generated, stored, treated, transported, disposed or otherwise handled by you;**
- e. when such hazardous substance, material or solid waste was used, purchased, generated, stored, treated, transported, disposed or otherwise handled by you;**
- f. where such hazardous substance, material or solid waste was used, purchased, generated, stored, treated, transported, disposed or otherwise handled by you; and**
- g. the quantity of such hazardous substance, material or solid waste was used, purchased, generated, stored, treated, transported, disposed or otherwise handled by you.**

Response:

No.

11. Identify all persons, including, but not limited to the Respondent, who may have arranged for disposal or treatment or arranged for transportation for disposal or treatment of Respondent's hazardous substances, materials, or solid wastes at or to the Site. In addition, identify the following:

- a. the hazardous substance or material or solid waste;**
- b. the chemical composition, characteristics, physical state (e.g., solid, liquid) of each hazardous substance or material or solid waste;**
- c. the process for which each hazardous substance or material or solid waste was used or the process which generated the hazardous substance or material or solid waste;**
- d. the person(s) with whom Respondent or such other persons made arrangements for disposal or treatment or transportation for disposal or treatment of hazardous substances or materials or solid wastes.**
- e. the nature and extent of each arrangement that existed between Respondent and each such person;**
- f. the time period during which each arrangement existed between Respondent and each such person;**
- g. where such hazardous substance or material or solid waste was used, purchased, generated, stored, treated, transported, disposed or otherwise handled by you;**
- h. the date of every transaction on which each hazardous substance or material or solid waste was so transported to or accepted for transport at or to the Site;**
- i. the quantity (weight or volume) of such hazardous substance or material or solid waste involved in each transaction and the total quantity for all transactions;**
- j. all tests, analyses, and analytical results concerning the hazardous substances, materials or solid waste;**

- k. the amount paid in connection with each transaction, the method of payment, and the identity of the person making the payment;**
- l. the person(s) who selected the Site as the place where the hazardous substances, materials or solid would be disposed;**
- m. where the person identified in subpart l) above, intended to have such hazardous substances, materials or solid waste transported and all evidence of this intent;**
- n. whether the hazardous substances, materials or hazardous waste involved in each transaction were transshipped through, or were stored or held at, any intermediate site prior to final treatment or disposal;.**
- o. what was actually done to the hazardous substances, materials or solid wastes once they were brought to the Site;**
- p. the final disposition of each of the hazardous substances, materials or solid waste involved in such transactions;**
- q. the measures taken by Respondent to determine the actual methods, means, and site of treatment or disposal of the hazardous substances, materials or solid waste involved in each transaction;**
- r. the type and number of containers in which the hazardous substances, materials or solid waste were contained when they were accepted for transport, and subsequently until they were deposited at the Site, and all markings on such containers;**
- s. the price charged for transport and/or disposal per drum, barrel, container, load (or whatever unit used) of hazardous substance or material or solid waste brought to the Site.**

Response:

There was no arrangement for disposal, treatment, or transportation of hazardous substance, materials, or solid wastes of Respondent, in connection with the Site. As to others, see documents identified at no. 2 and see no. 3.

12. Produce all documents relating to the transportation, delivery, treatment, storage, disposal, or handling of materials, hazardous substances, pollutants or contaminants, or solid waste at or to the Site, including but not limited to the following:

- a. manifests, shipping records, logs or other records regarding the transportation, delivery, shipment, disposal or handling of hazardous substances, materials or solid wastes to or at the Site;
- b. all invoices, evidence of payment, and other records relating to billing for the transportation, delivery, shipment, disposal or handling of hazardous substances, materials or solid waste to or at the Site.

Response:

Respondent did not transport, deliver, treat, store, dispose or handle materials, hazardous substances, pollutants, contaminants or solid waste at or to the Site. As to others' involvement in connection with the Site, see documents identified at no. 2.

13. Identify all liability insurance policies held by Respondent from 1950 to 1980. In identifying such policies, state the name and address of each insurer and of the insured; the amount of coverage under each policy, the commencement and expiration dates for each policy, whether the policy contains a "pollution exclusion" clause, and whether the policy covers or excludes sudden, non-sudden or both types of accidents. In lieu of providing this information, Respondent may submit complete copies of all relevant insurance policies.

Response:

Respondent has numerous insurance policies and, if necessary, will make such policies available for inspection and copying at a mutually convenient time.

14. Provide copies of all income tax returns sent to the Federal Internal Revenue Service in the last five years.

Response:

It is very burdensome and expensive for Respondent to provide the requested tax returns, especially given Respondent's lack of connection with the Site as set forth in this Response. . By way of further answer, RH (the parent company of Plaskon as set forth above) is a Fortune 500 Company, and its financial information is filed with, and readily available,

at the Securities and Exchange Commission. Further, nothing in the tax returns would shed light on the subject of this Request for Information.

15. If Respondent is a Corporation, respond to the following requests:

- a. provide a copy of the Articles of Incorporation and By-Laws of the Respondent.
- b. provide Respondent's financial statements for the past five fiscal years, including, but not limited to those filed with the Internal Revenue Service.
- c. identify all of Respondent's current assets and liabilities and the persons who currently own or are responsible for such assets and liabilities.

Response:

It is very burdensome and expensive for Respondent to provide the requested corporate information, especially given Respondent's lack of connection with the Site as set forth in this Response. By way of further answer, RH (the parent company of Plaskon, as set forth above), is a Fortune 500 Company, and its financial information is filed with and readily available at the Securities and Exchange Commission. Further, nothing in the requested corporate information would shed light on the subject of this Request for Information.

16. If Respondent is a Partnership, provide copies of the Partnership Agreement.

Response:

Not applicable.

17. If Respondent is a Trust, provide all relevant agreements and documents to support this claim.

Response:

Not applicable.

COMMONWEALTH OF PENNSYLVANIA :

: SS.

COUNTY OF PHILADELPHIA :

**AFFIDAVIT IN SUPPORT OF
ANSWERS TO REQUEST FOR INFORMATION**

I hereby affirm and certify, under penalty of perjury, that I am Senior Counsel of Rohm and Haas Company. As such I am authorized to certify that the following facts are true to the best of my knowledge, information and belief:

- a. I have personally examined and am familiar with the information provided herein in response to the EPA's Request for Information.
- b. All the answers contained herein are true, complete and accurate to the best of my information and belief.
- c. All documents herein are complete and authentic to the best of my knowledge and information, unless otherwise indicated.
- d. In the preparation of the responses herein and/or through prior inquiry relating to the City of Toledo's investigation of the Site, I have contacted and discussed the issues contained in the requests with all present and former employees and agents whom I have reason to believe may have been familiar with any information concerning the shipment of any materials to the Dura site and with any of the issues and questions contained in this request.
- e. In preparation of the responses herein and/or through prior inquiry relating to the City of Toledo's investigation of the Site, a diligent record search has been completed.

Ellen S. Friedell

ELLEN S. FRIEDEL

Sworn to and Subscribed before me

this 15th day of March, 1993.

Thomas H. Bucher
Notary Public

My commission expires
NOTARIAL SEAL
BUCHER, Notary Public
City of Philadelphia, Phila. County
My Commission Expires December 3, 1995

450148

7546

J. Douglas McKee, I.H.

CONSULTANT
418 S. MAIN ST.
BOWLING GREEN, OHIO 43402

SPECIALIZING IN
INDUSTRIAL HYGIENE
AND SAFETY

CERTIFIED SAFETY
PROFESSIONAL
OSHA 1720

303-88
✓ 25
TELEPHONE
419-363-4443

June 8, 1984

Dr. Richard T. Bennett, President
Plaskon Products, Inc.
2829 Glendale Avenue
Toledo, Ohio 43614

Dear Dr. Bennett:

Plaskon Products, Inc., has for years, held an EPA Hazardous Waste Treatment, Storage, and Disposal facility (TS&D) interim status permit. This EPA permit allowed longer term waste storage on site, treatment, and overall greater latitude than simple generator status. With this permit though came the burden of a large permit fee, regular inspections by the EPA and plant personnel, and a lot of paperwork. This was fine while the urea formaldehyde plant was operating and generating large amounts of wastes, but with the closure of that facility, it was decided that it would no longer be worth the hassle to keep the permit valid. Also, the closing of the amino operation necessitated compliance with certain EPA rules regarding partial closure.

Quite a while back, Bob Wholf initiated closure and permit elimination via letters to the EPA. More recently, I was asked to follow up on said notification and coordinate and complete the actual closure in compliance with an extended EPA deadline of March 15, 1984. This letter is notification to you that that deadline was met and that closure is complete and has been certified. All wastes have been removed from the closed portion of the site and have been disposed of; only a few loose ends remain which will be discussed later.

Enclosed is a description of some of our accomplishments regarding the closure and waste disposal effort:

--Liaison with Government Officials

Prior to and during closure, contacts were made, and a close working relationship established with appropriate USEPA, Ohio EPA, City of Toledo, and other government officials as needed to assure that we were meeting the letter and intent of the laws. I assured all involved that it was the intent

of Plaskon Management to fully comply with all applicable regulations or specially imposed requirements. EPA officials agreed with the plan I submitted which again had a twofold purpose: (1) to close the Amino U/P operation, and (2) to eliminate the need for a Hazardous Waste TS&D facility permit since the remaining PEMCO operation will generate very little hazardous waste in comparison.

—Initial Inventory

Closure rules dictate that all hazardous wastes be removed from the plant to disposal sites prior to the deadline. Further, I was asked to remove all wastes from the areas involved, both hazardous and non-hazardous, as part of an overall clean-up effort. Initially, with the help of Ron Schrecongost, I began to inspect all plant areas and tanks, and assemble a current Waste Product Inventory. Over 100 different waste streams were discovered, not including the approximately 1000 different chemical pigments. These waste streams represented a multitude of various chemical compounds, both solid and liquid, hazardous and non-hazardous. Far more was found than was originally anticipated. As wastes were discovered, each was given an individual waste product number. Following are a few examples of some of the wastes found:

1. Approximately 15-20,000 gallons of waste plasticizers, alcohols, solvents, monomers, phthalates, acids, alkalies, and other liquid chemicals remaining from the coating resins and amino manufacturing days.
2. 9000 lbs. of caustic, solidified in a large tank. (When dissolved, this turned into about 14,000 gallons of caustic waste solution.)
3. Old lab chemicals/lab waste from several laboratories.
4. Unused, contaminated raw materials both solid and liquid (e.g., maleic anhydride, fumaric acid, TCPA, etc.)
5. Approximately 40 - 55 gallon drums of waste oils.
6. Chemicals and pigments containing heavy metals.
7. Acids and caustics.
8. Sludges left in the bottoms of various tanks and containers.
9. Asbestos insulation removed from tanks and piping in tank farm.
10. Old molding compounds and samples.
11. Approximately 750 drums of paraformaldehyde or formalin solution.
12. And other miscellaneous wastes, in small quantities, such as: MPA distillates, sewer pit cleanout wastes, old cleaning chemicals (oakite), kettle condensates, oil skims, and chlorinated and unchlorinated cleaning solvents.

Many of the wastes found had to be identified or confirmed via laboratory tests due to their age, condition, or inadequate or no labeling.

—Staging and Processing

After initial inventory was developed, many of the wastes were removed from tanks or containers where necessary and moved to one of several staging areas on-site. Here, the wastes were repackaged or redrummed if needed, properly labeled, renumbered or anything else necessary to properly prepare the wastes. Other wastes were left in tanks for later pump-out or until permission was received from the City of Toledo to slowly sever certain chemicals (mainly sodium hydroxide and formalin solutions). The caustic was removed from its tank by steam dissolving over a 4-day period, placed in a holding tank and severed gradually over 2-3 weeks. All severing was done with great care and with daily sewer monitoring of COD, BOD, and PH to assure that we stayed within dictated guidelines. No major problems were noted during the severing operations. After final pump-out of some of the classified hazardous wastes, either a triple rinse or cleanout with floor dry was used to assure that all remaining traces of the wastes were gone.

—Transportation/Disposal

After wastes were identified, assembled, logged and so on, it was necessary to find proper, acceptable disposal sites for each. Many facilities were contacted as well as recyclers, reclaimers, etc. Some of the wastes were sent out on a trial basis for experimentation to assure that the proposed methods of disposal would indeed work. Results indicated that disposal of the paraform via incineration was not only feasible, but a very viable alternative. By law, detailed Waste Product Surveys had to be made out for each waste that was to be sent off-site to another facility. That facility would, in turn, either grant or deny permission to have the waste sent to their site. After several visits to prospective disposal sites, alternatives were developed and presented to management. Decisions were then made as to what facilities and types of disposal would be used. The bulk of the wastes were incinerated at three different thermal destruction sites. The paraform went to Stablax-Reutter in South Carolina; the high BTU content liquids (plasticizers, alcohols, etc.) were blended at Petro-Chemical, Inc. for use as blast furnace fuel, and a variety of other toxic solids and liquids were sent to Ross Incineration. Some of the aqueous solution wastes were sent to Michigan Disposal to be neutralized, fixated, and landfilled. Other non-hazardous, solid wastes were simply landfilled in the normal way. A few chemicals were able to be reused by the PEMCO operation, but another recycling/reclaim test (the dissolving and use of the paraformaldehyde by Malvern Chemical) was not considered a viable alternative due to liability and the length of time needed for the operation to be completed.

All waste was thoroughly manifested prior to transportation and all D.O.T. regulations such as for labeling, marking, placarding, and packaging were complied with. Cousins Waste Control transported much of the waste and also pumped many of the liquids from tanks via a 4000-gallon vacuum truck. Other truck lines were also used to haul some of the wastes and no incidents

Dr. Richard T. Bennett
Page 4
June 8, 1984

occurred. Visual confirmation has been made of the Ross disposal effort and the Stablax-Reutter site will be checked next week by myself to confirm and document the paraformaldehyde disposal.

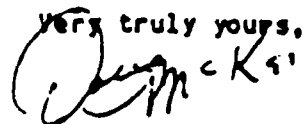
--Final Inspections and Certification of Closure

Several final inspections have been made of the Plaskon facilities. First, I made several tours to assure the clean-up was complete and to tie up loose ends. As required by law, we had an independent Professional Engineer, William Auberle, tour the site. He certified that we had properly disposed of all wastes and had completed the partial closure. Further, the EPA sent an inspector out recently to tour the facility and he again certified by letter to his superiors that we had done a proper job and that he found no violations regarding the completed closure. Letters of certification of closure from both Plaskon management and the independent Professional Engineer were sent to the EPA in Columbus, Ohio, and we are now awaiting their response and final disposition in this matter. It is thought that we will soon be under generator or small generator status and that the 12-Digit Plaskon Products, Inc. EPA I.D. Number will be transferred to the PEMCO operation. In anticipation of this, we are drafting up new waste control procedures and waste handling methods. The hazardous waste storage shed is being cleaned and wastes in the interim are being processed for disposal. Generator regulations will mandate that no hazardous waste be accumulated on-site longer than 90 days. Further, there are many other regulations concerning other topics that we must abide by.

--Summary

In summary, I feel that the partial closure, the waste disposal and all other tasks involved, were accomplished without incident, and in accordance with all applicable EPA, City of Toledo, OSHA, and other regulations. Soon, after a few remaining tasks are accomplished and final disposition is received from the EPA, we should be in a position to administer a down-scaled, efficient, waste control program in compliance with generator status requirements.

If you have further questions, please feel free to contact me. I will update you on further developments as necessary.

Very truly yours,


Doug McKee, CSP, IH

Enclosure

cc: M.H. Riddell
A.J. tenBrink
R.D. Kelly
J.C. Peterson✓

450150

4540

Ohio EPA

Re: Lucas County
Hazardous Waste
Plaskon Products, Inc.
HWFAB# 03-48-0143
USEPA# OHDO94808904
G-TSDF to SQG

60-
127

Mr. Tom Carlisle, Manager
Technical Assistance
Division of Solid & Hazardous Waste Mgt.
Ohio EPA
361 East Broad Street
Columbus, Ohio 43215

May 13, 1984

Teled

Dear Mr. Carlisle:

On May 17, 1984, all of the closed portions of Plaskon Products, Inc. were inspected for final closure by Doug McKee, Consultant, and myself. No hazardous waste was found. Blueprints of the facility were used to make certain that no portion of the closed facility was not inspected.

The open portion of the facility is being operated under the new name, Plaskon Electronic Materials, Inc. (PEMCO).

Marie Oliver, RCRA Activities, Region V, USEPA, recommended that the EPA ID number be transferred from the closed facility to the "new" one. This is verified in the April 5, 1984, letter to RCRA activities. See attachment.

PEMCO will be classified a small quantity generator but intends to maintain all the necessary paperwork and meet all requirements for a generator classification.

Yours truly,

David L. Ferguson

David L. Ferguson
Division of Solid & Hazardous Waste Mgt.

DLF/1st

cc: Paula Cotter, DSHWM
cc: Plaskon Electronic Materials, Inc.
cc: Doug McKee ✓
cc: File



PLASKON PRODUCTS, INC.

October 20, 1982

Mr. E. Shields
Allied Corporation
P.O. Box 1139R
Morristown, NJ 07960

Dear Ed:

As requested during our telephone conversation today, enclosed is a copy of some pertinent information from the Honorable Bob Eckhardt survey file on past practices of disposal of waste materials generated by the Toledo Plant.

According to the file, the Terry Little Company removed plasticizer wastes and other oil waste products from the Toledo Plant. Plasticizers were produced at this location from 1959 to 1969, which would encompass the year 1968 that you indicated was under review.

The enclosures include all the records or documents that have been found concerning disposal of wastes by the Terry Little Company during the subject period. I understand we have no purchase orders, accounts payable or other records prior to 1973.

According to the recollections of employees, the plasticizer wastes included scrap plasticizers and spent recycle alcohols. The plasticizers were manufactured from phthalic anhydride and long chain (8 and 10 carbon) aliphatic alcohols. The other waste oils included conventional lubricating and hydraulic oils.

If you have any questions concerning this information, please let me know.

Very truly yours,

A handwritten signature in dark ink, appearing to read "R. H. Wholf".

R. H. Wholf, Manager
Environmental Services

RHW:ibh

Enclosures: W. R. Mauter to R. J. Donovan, etal - 5/30/79
E. L. Kratzman notes dated 4/30/79
W. H vonHarling to R. H. Wholf - 6/5/79

cc: W. R. Mauter
E. L. Kratzman

2829 Glendale Avenue • Toledo, Ohio 43614 • (419) 382-5611

450138
6/85 4540

PLASKON OH ENV

EXHIBIT C-2

300580
✓1250

PLASKON ELECTRONIC MATERIALS, INC. & PLASKON PRODUCTS, INC.

WASTE DISPOSAL SITES

JULY 10, 1979 TO PRESENT

LOS ANGELES

Mission County Landfill No. 3
2201 North Sepulveda
Los Angeles, California 90049

Calabassas Landfill No. 5
26919 Ventura Boulevard
Agoura, California 91301

BKK Landfill Sanitary Landfill
2210 South Azusa
West Covina, California 91791

TOLEDO

Westover Corp. Sanitary Landfill
819 Otter Creek Road
Toledo, Ohio 43616

General Electric Apparatus Service Division
156 Circle Freeway Drive
Cincinnati, Ohio 45200

Stauffer Chemical Corporation
Special Chemical Division
Sand Creek Highway
Weston, Michigan 49289

Ace Oil Co.
876 Otter Creek Road
Toledo, Ohio 43616

Chemical Waste Management, Inc.
4645 Executive Drive
Columbus, Ohio 43220

Cousins Waste Control Corporation
P. O. Box 2881
Toledo, Ohio 43606

Browning Ferris Industries
P. O. Box C
5400 Cogswell Road
Wayne, Michigan 48184

Waste Management of Alabama, Inc.
P. O. Box 55
Emelle, Alabama 35459

American Industrial Waste
Industrial Drive
White Bluff, Tennessee 37187

Ensco, Inc.
American Road
El Dorado, Arizona 71730

M. Petty & Sons
2800 Lagrange Street
Toledo, Ohio 43612

Stablex of South Carolina, Inc.
Ninth & Cooper Streets
P. O. Box 2664 CRS
Rockhill, South Carolina 29731-2664

Malvern Chemical Co.
Route #3, Gifford
Malvern, Arkansas 72104

Ross Administrative Services, Inc.
394 Giles Road
Grafton, Ohio 44044-9752

Michigan Disposal, Inc.
4935 North Service Drive
Belleville, Michigan 48111

Wayne Disposal, Inc.
P O Box 5187
Dearborn, Michigan 48124

Petro Chemical Processing
421 Lycaste
Detroit, Michigan 48124

7/12/84

MEMORANDUM

JUNE 1, 1979

D. R. Fitts

HON. BOB ECKHARDT SURVEY

Attached is the Waste Disposal Survey completed for the Toledo Plant.

Also attached for your files is a copy of the confirmatory letter that was sent to those persons interviewed to collect the information for this report. We do not intend this letter to be a part of the report.

R. Ray and W. Mauter did a good job compiling the report. Let us know if you have any questions.

R. H. Wholf
R. H. Wholf

RHW:bw
Encl.

cc: N. Kuller
R. Ray
W. Mauter

x ref to
10/20/82
letter
from
Shields

DATE: May 30, 1979

SUBJECT: PAST PRACTICES FOR DISPOSAL OF WASTE MATERIALSTO: R. J. Donovan
J. P. Evans
E. L. Kratzman
W. H. von Harling
B. J. Schaller

Per a request by the Congressional Subcommittee on Oversight and Investigations, we were asked to fill out a survey covering our waste disposal practices since 1950. Our records since 1973 are no longer available, thus much of the information was obtained through interviews with present and past employees.

The following is a general overview from the information obtained from several employees. Please review same and let us know by June 5th if you are in general agreement.

GENERAL WASTE

Most of our general waste is collected in compactors and hauled by our employees to landfills. The sites used since 1950 are:

1. Western or South Street Dump - 1950-1957
2. Consaul Street Dump - 1957-1959
3. Dura Dump Landfill - 1959-1965
4. Kings Road Landfill - 1965-1973
5. Westover Landfill - 1973-Present

In addition, when our compactors were out of order, R. Donovan has had BFI haul some waste to their Hagman Road Landfill.

COATING RESIN WASTE

When the Coating Resin Plant was in operations, Fondessy took most of the plant waste other than plasticizing oil and general lubricating oils.

These wastes mostly consisted of filter press waste, mixer clean waste, gelled resin waste and sometimes spent solvents.

Terry Little took some plasticizing and other oil products waste during the period the Coating Resin Plant was in operations.

After the Coating Resin Plant ceased operations, J. L. Spradlin Company took the mixer clean waste and flammable waste to the Evergreen Landfill in Wood County.

5/30/79

OTHER

From Maintenance records it was determined that Roto Roter cleaned the Molding Compound East Sump on at least one occasion and BFI on another.

BFI has also cleaned the formaldehyde storage tank.

We could find no records on the clean-out and disposal of material from the roto-cone pond. However it was recalled that on at least one occasion the material was taken to a dump on Glendale Avenue owned by Constable Biggs.

W. R. Mauter
W. R. Mauter

WRM:bw

cc: R. H. Wholf

FORM A: GENERAL FACILITY INFORMATION

Company Name: ALLIED CHEMICAL CORPORATION

Facility Name: SPECIALTY CHEMICALS DIVISION - TOLEDO, OHIO

Address: 2829 GLENDALE AVENUE
No. Street

TOLEDO OHIO 43614
City State Zip Code

Name of Person Completing Form: R. H. WHOLF

Position: MANAGER ENVIRONMENTAL SERVICES

Phone Number: (201) 455-4294 (J. Garrison - contact)

1. Year Facility Openedpurchased from Libbey Owens Ford..... 19 53 (10-11)

2. Primary SIC Code :282 (12-15)

3. Estimate the total amounts of process wastes (excluding wastes sold for use) generated by this facility during 1978:

thousand gallons (16-24)

hundred tons 21 (25-32)

thousand cubic yards (33-41)

4. Estimate (in whole percents) how these process wastes generated in 1978 were disposed of:

in landfill 100 (42-44)

in pit/pond/lagoon - (45-47)

in deep well - (48-50)

incinerated 0 (51-53)

reprocessed/recycled - (54-56)

evaporated - (57-59)

unknown - (60-62)

other (Specify) - (63-65)

5. What is the total number of known sites (including disposal on the property where this facility is located as one site) that have been used for the disposal of process wastes from this facility since 1950?..... 14 (66-68)

COMPLETE ONE FORM "B" FOR EACH OF THE SITES

6. Have any of the process wastes generated at this facility been hauled (removed) from this facility for disposal? (Yes=1; no=2) 1 (69)

IF YES, COMPLETE FORM "C"

7. Do you know the disposal site locations of all of the process waste hauled from your facility since 1950? (Yes=1; no=2) 1 (70)

IF NO, COMPLETE ONE FORM "D" FOR EACH FIRM OR CONTRACTOR WHO TOOK WASTE TO AN UNKNOWN LOCATION

8. Specify the earliest year represented by information from company or facility records supplied on this and other forms1973 (71-72)

9. Specify the earliest year represented by information from employee knowledge supplied on this and other forms1973 (73-74)

FORM A: GENERAL FACILITY INFORMATION

Company Name: ALLIED CHEMICAL CORPORATION

Facility Name: SPECIALTY CHEMICALS DIVISION - TOLEDO, OHIO

Address: 2829 CLENDALE AVENUE
 No. Street

TOLEDO OHIO 43614
 City State Zip Code

Name of Person Completing Form: R. H. WHOLF

Position: MANAGER ENVIRONMENTAL SERVICES

Phone Number: (201) 455-4294 (J. Garrison - contact)

1. Year Facility Openedpurchased from Libbey Owens Ford..... 19 53 (10-11)
2. Primary SIC Code : 282 (12-15)
3. Estimate the total amounts of process wastes (excluding wastes sold for use) generated by this facility during 1978:

thousand gallons	<u> </u>	(16-24)
hundred tons	<u> 21</u>	(25-32)
thousand cubic yards	<u> </u>	(33-41)
4. Estimate (in whole percents) how these process wastes generated in 1978 were disposed of:

in landfill	<u>100</u>	(42-44)
in pit/pond/lagoon	<u> </u>	(45-47)
in deep well	<u> </u>	(48-50)
incinerated	<u> 0</u>	(51-53)
reprocessed/recycled	<u> </u>	(54-56)
evaporated	<u> </u>	(57-59)
unknown	<u> </u>	(60-62)
other (Specify _____)	<u> </u>	(63-65)
5. What is the total number of known sites (including disposal on the property where this facility is located as one site) that have been used for the disposal of process wastes from this facility since 1950?..... 14 (66-68)

COMPLETE ONE FORM "B" FOR EACH OF THE SITES

6. Have any of the process wastes generated at this facility been hauled (removed) from this facility for disposal? (Yes=1; no=2) 1 (69)

IF YES, COMPLETE FORM "C"

7. Do you know the disposal site locations of all of the process waste hauled from your facility since 1950? (Yes=1; no=2) 1 (70)

IF NO, COMPLETE ONE FORM "D" FOR EACH FIRM OR CONTRACTOR WHO TOOK WASTE TO AN UNKNOWN LOCATION

8. Specify the earliest year represented by information from company or facility records supplied on this and other forms1973 (71-72)
9. Specify the earliest year represented by information from employee knowledge supplied on this and other forms1953 (73-74)

COMPLETE THIS FORM FOR EVERY SITE (INCLUDING THE LOCATION OF THIS FACILITY AS ONE SITE) USED FOR THE DISPOSAL OF PROCESS WASTES GENERATED BY THIS FACILITY SINCE 1950.

Company Name: ALLIED CHEMICAL CORPORATION
Facility Name: SPECIALTY CHEMICALS DIVISION - TOLEDO, OHIO
Name of Site: WESTERN/SOUTH AVENUE TOLEDO MUNICIPAL SANITARY LANDFILL
Address of Site: SOUTH AVENUE and MAUMEE RIVER
no. street

TOLEDO OHIO
city state zip code

Name of Owner (while used by facility): TOLEDO CITY
Address: _____
no. street

TOLEDO OHIO
city state zip code

Current Owner (if different from above): SAME
Address: _____
no. street

_____ state _____
city zip code

1. Location (1= the property on which facility is located; 2= off-site)..... 2 (10)
2. Ownership at time of use (1= company ownership; 2=private but not company ownership) 3=public ownership) 3 (11)
3. Current status (1= closed; 2= still in use; 9=don't know) 1 (12)
IF CLOSED, specify year closed 1957 (13-14)
4. Year first used for process waste from this facility 1950 (15-16)
5. Year last used for process waste from this facility (enter "79" if still in use) 1956 (17-18)
6. Total amount of process waste from this facility disposed at site:
thousand gallons (19-26)
hundred tons EST. 1186 (27-33)
thousand cubic yards (34-41)
7. Specify type(s) of disposal method(s) used at site and whether method is still in use (1=currently in use; 2=no longer in use; 3=never used; 9=don't know)
landfill, mono industrial waste 3 (42)
landfill, mixed industrial waste 2 (43)
landfill, drummed waste 9 (44)
landfill, municipal refuse co-disposed ... 2 (45)
pits/ponds/lagoons 9 (46)
deep well injection 9 (47)
land farming 9 (48)
incineration 9 (49)
treatment (eg. neutralizing)..... 9 (50)
reprocessing/recycling 9 (51)
other (specify) 9 (52)
8. Users of this site (1=this facility; 2=this facility and other company facilities only; 3=this company and others; 9=don't know) 3 (53)

LIST NAMES AND ADDRESSES OF OTHER KNOWN USERS BELOW

NOTE: Allied Chemical acquired producing facility from Libbey Owens Ford in 1953.

Company Name: ALLIED CHEMICAL CORPORATION

Facility Name: SPECIALTY CHEMICALS DIVISION-TOLEDO, OHIO

Site Name: WESTERN/SOUTH AVENUE MUNICIPAL DUMP

9. Components (or characteristics) of process waste from this facility disposed at site: (1=present in waste; 2=not present in waste; 9=don't know)

FILL IN EVERY BLOCK SPACE

Acid solutions, with pH < 3.....	2	(10)
pickling liquor	2	(11)
metal plating waste	2	(12)
circuit etchings	2	(13)
inorganic acid manufacture	2	(14)
organic acid manufacture	2	(15)
Base solutions, with pH > 10	2	(16)
caustic soda manufacture	2	(17)
nylon and similar polymer generation	2	(18)
scrubber residual	2	(19)
Heavy metals & trace metals (bonded organically & inorganically)	1	(20)
arsenic, selenium, antimony	1	(21)
mercury	2	(22)
iron, manganese, magnesium	2	(23)
zinc, cadmium, copper, chromium (trivalent)	1	(24)
chromium (hexavalent)	1	(25)
lead	1	(26)
Radioactive residues, > 3 pico curies/liter	2	(27)
uranium residuals & residuals for UF ₆ recycling	2	(28)
lathanide series elements and rare earth salts	2	(29)
phosphate slag	2	(30)
thorium	2	(31)
radium	2	(32)
other alpha, beta & gamma emitters	2	(33)
Organics.....	1	(34)
pesticides & intermediates	2	(35)
herbicides & intermediates	2	(36)
fungicides & intermediates	2	(37)
rodenticides & intermediates	2	(38)
halogenated aliphatics	1	(39)
halogenated aromatics	2	(40)
acrylates & latex emulsions	2	(41)
PCB/PBB's	2	(42)
amides, amines, imides	1	(43)
plastizers	1	(44)
resins	1	(45)
elastomers	2	(46)
solvents polar (except water)	1	(47)
carbontetrachloride	2	(48)
trichloroethylene	2	(49)
other solvents nonpolar	1	(50)
solvents halogenated aliphatic.....	1	(51)
solvents halogenated aromatic	2	(52)
oils and oil sludges	2	(53)
esters and ethers	1	(54)
alcohols	1	(55)
ketones & aldehydes	1	(56)
dioxins	2	(57)
Inorganics	2	(58)
salts	2	(59)
mercaptans	2	(60)
Misc.....	1	(61)
pharmaceutical wastes	2	(62)
paints & pigments	1	(63)
catalysts (eg. vanadium, platinum, palladium)	1	(64)
asbestos	1	(65)
shock sensitive wastes (eg. nitrated toluenes)	2	(66)
air water reactive wastes (eg. P ₄ , aluminum chloride)	2	(67)
wastes with flash point below 100° F.....	9	(68)

Only trace amounts of heavy metals and solvents were in waste.

(COMPLETE THIS FORM FOR EVERY SITE (INCLUDING THE LOCATION OF THIS FACILITY AS ONE SITE) USED FOR THE DISPOSAL OF PROCESS WASTES GENERATED BY THIS FACILITY SINCE 1950.)

Company Name: ALLIED CHEMICAL CORPORATION
Facility Name: SPECIALTY CHEMICAL DIVISION - TOLEDO, OHIO
Name of Site: CONSAUL STREET TOLEDO MUNICIPAL SANITARY LANDFILL
Address of Site: CONSAUL STREET AND C&O RAILROAD
no. street

TOLEDO OHIO
city state zip code

Name of Owner (while used by facility): TOLEDO CITY
Address: TOLEDO OHIO
no. street

city state zip code

Current Owner (if different from above): UNKNOWN
Address: no. street

city state zip code

1. Location (1= the property on which facility is located; 2= off-site)..... 2 (10)
2. Ownership at time of use (1= company ownership; 2=private but not company ownership) 3=public ownership) 3 (11)
3. Current status (1= closed; 2= still in use; 9=don't know) 1 (12)
IF CLOSED, specify year closed 1959 (13-14)
4. Year first used for process waste from this facility 1957 (15-16)
5. Year last used for process waste from this facility (enter "79" if still in use) 1959 (17-18)
6. Total amount of process waste from this facility disposed at site:
thousand gallons 111111 (19-26)
hundred tons EST. 111156 (27-33)
thousand cubic yards 111111 (34-41)
7. Specify type(s) of disposal method(s) used at site and whether method is still in use (1=currently in use; 2=no longer in use; 3=never used; 9=don't know)
landfill, mono industrial waste 3 (42)
landfill, mixed industrial waste 2 (43)
landfill, drummed waste 9 (44)
landfill, municipal refuse co-disposed ... 2 (45)
pits/ponds/lagoons 9 (46)
deep well injection 9 (47)
land farming 9 (48)
incineration 9 (49)
treatment (eg. neutralizing)..... 9 (50)
reprocessing/recycling 9 (51)
other (specify) 9 (52)
8. Users of this site (1=this facility; 2=this facility and other company facilities only; 3=this company and others; 9=don't know) 3 (53)

LIST NAMES AND ADDRESSES OF OTHER KNOWN USERS BELOW

Company Name: ALLIED CHEMICAL CORPORATION

Facility Name: SPECIALTY CHEMICALS DIVISION-TOLEDO, OHIO

Site Name: CONSAUL STREET TOLEDO MUNICIPAL SANITARY LANDFILL

9. Components (or characteristics) of process waste from this facility disposed at site: (1=present in waste; 2=not present in waste; 9=don't know)

FILL IN EVERY BLOCK SPACE

Acid solutions, with pH < 3	2	(10)
pickling liquor	2	(11)
metal plating waste	2	(12)
circuit etchings	2	(13)
inorganic acid manufacture	2	(14)
organic acid manufacture	2	(15)
Base solutions, with pH > 10	2	(16)
caustic soda manufacture	2	(17)
nylon and similar polymer generation	2	(18)
scrubber residual	2	(19)
Heavy metals & trace metals (bonded organically & inorganically)	1	(20)
arsenic, selenium, antimony	1	(21)
mercury	2	(22)
iron, manganese, magnesium	2	(23)
zinc, cadmium, copper, chromium (trivalent)	1	(24)
chromium (hexavalent)	1	(25)
lead	1	(26)
Radioactive residues, > 3 pico curies/liter	2	(27)
uranium residuals & residuals for UF ₆ recycling	2	(28)
lathanide series elements and rare earth salts	2	(29)
phosphate slag	2	(30)
thorium	2	(31)
radium	2	(32)
other alpha, beta & gamma emitters	2	(33)
Organics	1	(34)
pesticides & intermediates	2	(35)
herbicides & intermediates	2	(36)
fungicides & intermediates	2	(37)
rodenticides & intermediates	2	(38)
halogenated aliphatics	1	(39)
halogenated aromatics	2	(40)
acrylates & latex emulsions	2	(41)
PCB/PBB's	2	(42)
amides, amines, imides	1	(43)
plastizers	1	(44)
resins	1	(45)
elastomers	2	(46)
solvents polar (except water)	1	(47)
carbontetrachloride	2	(48)
trichloroethylene	2	(49)
other solvents nonpolar	1	(50)
solvents halogenated aliphatic	1	(51)
solvents halogenated aromatic	2	(52)
oils and oil sludges	2	(53)
esters and ethers	1	(54)
alcohols	1	(55)
ketones & aldehydes	1	(56)
dioxins	2	(57)
Inorganics	2	(58)
salts	2	(59)
mercaptans	2	(60)
Misc	1	(61)
pharmaceutical wastes	2	(62)
paints & pigments	1	(63)
catalysts (eg. vanadium, platinum, palladium)	1	(64)
asbestos	1	(65)
shock sensitive wastes (eg. nitrated toluene)	2	(66)
air water reactive wastes (eg. P ₄ , aluminum chloride)	2	(67)
wastes with flash point below 100° F.	2	(68)

Only trace amounts of heavy metals and solvents were in waste.

Company Name: ALLIED CHEMICAL CORPORATION

Facility Name: SPECIALTY CHEMICALS DIVISION - TOLEDO, OHIO

Site Name: DURA TOLEDO MUNICIPAL SANITARY LANDFILL

9. Components (or characteristics) of process waste from this facility disposed at site: (1=present in waste; 2=not present in waste; 9=don't know)

FILL IN EVERY BLOCK SPACE

Acid solutions, with pH < 3	2	(10)
pickling liquor	2	(11)
metal plating waste	2	(12)
circuit etchings	2	(13)
inorganic acid manufacture	2	(14)
organic acid manufacture	2	(15)
Base solutions, with pH > 10	2	(16)
caustic soda manufacture	2	(17)
nylon and similar polymer generation	2	(18)
scrubber residual	2	(19)
Heavy metals & trace metals (bonded organically & inorganically)	1	(20)
arsenic, selenium, antimony	1	(21)
mercury	2	(22)
iron, manganese, magnesium	2	(23)
zinc, cadmium, copper, chromium (trivalent)	1	(24)
chromium (hexavalent)	1	(25)
lead	1	(26)
Radioactive residues, > 3 pico curies/liter	2	(27)
uranium residuals & residuals for UF ₆ recycling	2	(28)
lathanide series elements and rare earth salts	2	(29)
phosphate slag	2	(30)
thorium	2	(31)
radium	2	(32)
other alpha, beta & gamma emitters	2	(33)
Organics	1	(34)
pesticides & intermediates	2	(35)
herbicides & intermediates	2	(36)
fungicides & intermediates	2	(37)
rodenticides & intermediates	2	(38)
halogenated aliphatics	1	(39)
halogenated aromatics	2	(40)
acrylates & latex emulsions	2	(41)
PCB/PBB's	2	(42)
amides, amines, imides	1	(43)
plastizers	1	(44)
resins	1	(45)
elastomers	2	(46)
solvents polar (except water)	1	(47)
carbontetrachloride	2	(48)
trichloroethylene	2	(49)
other solvents nonpolar	1	(50)
solvents halogenated aliphatic	1	(51)
solvents halogenated aromatic	2	(52)
oils and oil sludges	2	(53)
esters and ethers	1	(54)
alcohols	1	(55)
ketones & aldehydes	1	(56)
dioxins	2	(57)
Inorganics	2	(58)
salts	2	(59)
mercaptans	2	(60)
Misc	1	(61)
pharmaceutical wastes	2	(62)
paints & pigments	1	(63)
catalysts (eg. vanadium, platinum, palladium)	1	(64)
asbestos	1	(65)
shock sensitive wastes (eg. nitrated toluenes)	2	(66)
air water reactive wastes (eg. P ₄ , aluminum chloride)	2	(67)
wastes with flash point below 100° F.	9	(68)

Only trace amounts of heavy metals and solvents were in waste.

Company Name: ALLIED CHEMICAL CORPORATION

Facility Name: SPECIALTY CHEMICALS DIVISION - TOLEDO, OHIO

Site Name: KING ROAD LUCAS COUNTY SANITARY LANDFILL

9. Components (or characteristics) of process waste from this facility disposed at site: (1=present in waste; 2=not present in waste; 9=don't know)

FILL IN EVERY BLOCK SPACE

Acid solutions, with pH < 3.....	2	(10)
pickling liquor	2	(11)
metal plating waste	2	(12)
circuit etchings	2	(13)
inorganic acid manufacture	2	(14)
organic acid manufacture	2	(15)
Base solutions, with pH > 10	2	(16)
caustic soda manufacture	2	(17)
nylon and similar polymer generation	2	(18)
scrubber residual	2	(19)
Heavy metals & trace metals (bonded organically & inorganically)	1	(20)
arsenic, selenium, antimony	1	(21)
mercury	2	(22)
iron, manganese, magnesium	2	(23)
zinc, cadmium, copper, chromium (trivalent)	1	(24)
chromium (hexavalent)	1	(25)
lead	1	(26)
Radioactive residues, > 3 pico curies/liter	2	(27)
uranium residuals & residuals for UF ₆ recycling	2	(28)
lathanide series elements and rare earth salts	2	(29)
phosphate slag	2	(30)
thorium	2	(31)
radium	2	(32)
other alpha, beta & gamma emitters	2	(33)
Organics.....	1	(34)
pesticides & intermediates	2	(35)
herbicides & intermediates	2	(36)
fungicides & intermediates	2	(37)
rodenticides & intermediates	2	(38)
halogenated aliphatics	1	(39)
halogenated aromatics	2	(40)
acrylates & latex emulsions	2	(41)
PCB/PBB's	2	(42)
amides, amines, imides	1	(43)
plastizers	1	(44)
resins	1	(45)
elastomers	2	(46)
solvents polar (except water)	1	(47)
carbontetrachloride	2	(48)
trichloroethylene	2	(49)
other solvents nonpolar	1	(50)
solvents halogenated aliphatic.....	1	(51)
solvents halogenated aromatic	2	(52)
oils and oil sludges	2	(53)
esters and ethers	1	(54)
alcohols	1	(55)
ketones & aldehydes	1	(56)
dioxins	2	(57)
Inorganics	2	(58)
salts	2	(59)
mercaptans	2	(60)
Misc.....	1	(61)
pharmaceutical wastes	2	(62)
paints & pigments	1	(63)
catalysts (eg. vanadium, platinum, palladium)	1	(64)
asbestos	1	(65)
shock sensitive wastes (eg. nitrated toluenes)	2	(66)
air water reactive wastes (eg. P ₄ , aluminum chloride)	2	(67)
wastes with flash point below 100° F.....	9	(68)

Only trace amounts of heavy metals and solvents were in waste.

COMPLETE THIS FORM FOR EVERY SITE (INCLUDING THE LOCATION OF THIS FACILITY AS ONE SITE) USED FOR THE DISPOSAL OF PROCESS WASTES GENERATED BY THIS FACILITY SINCE 1950.

Company Name: ALLIED CHEMICAL CORPORATION
Facility Name: SPECIALTY CHEMICALS DIVISION - TOLEDO, OHIO
Name of Site: WESTOVER CORPORATION SANITARY LANDFILL
Address of Site: 820 OTTER CREEK RD.

no. street

OREGON 1 OHIO 43616
city state zip code

Name of Owner (while used by facility): WESTOVER CORPORATION SANITARY LANDFILL
Address: 820 OTTER CREEK ROAD

no. street

OREGON OHIO 43616
city state zip code

Current Owner (if different from above): SAME

Address: _____

no. street

city state zip code

1. Location (1= the property on which facility is located; 2= off-site)..... 2 (10)
2. Ownership at time of use (1= company ownership; 2=private but not company ownership) 3=public ownership) 2 (11)
3. Current status (1= closed; 2= still in use; 9=don't know) 2 (12)
IF CLOSED, specify year closed 19 (13-14)
4. Year first used for process waste from this facility 19 71 (15-16)
5. Year last used for process waste from this facility (enter "79" if still in use) 19 71 (17-18)
6. Total amount of process waste from this facility disposed at site:
thousand gallons (19-26)
hundred tons (27-33)
thousand cubic yards (34-41)
7. Specify type(s) of disposal method(s) used at site and whether method is still in use (1=currently in use; 2=no longer in use; 3=never used; 9=don't know)
landfill, mono industrial waste 3 (42)
landfill, mixed industrial waste 1 (43)
landfill, drummed waste 9 (44)
landfill, municipal refuse co-disposed ... 9 (45)
pits/ponds/lagoons 3 (46)
deep well injection 3 (47)
land farming 3 (48)
incineration 3 (49)
treatment (eg. neutralizing)..... 3 (50)
reprocessing/recycling 3 (51)
other (specify) 9 (52)
8. Users of this site (1=this facility; 2=this facility and other company facilities only; 3=this company and others; 9=don't know) 3 (53)

LIST NAMES AND ADDRESSES OF OTHER KNOWN USERS BELOW

Company Name: ALLIED CHEMICAL CORPORATION

Facility Name: SPECIALTY CHEMICALS DIVISION - TOLEDO, OHIO

Site Name: WESTOVER CORPORATION SANITARY LANDFILL

9. Components (or characteristics) of process waste from this facility disposed at site: (1=present in waste; 2=not present in waste; 9=don't know)

FILL IN EVERY BLOCK SPACE

Acid solutions, with pH < 3.....	2	(10)
pickling liquor	2	(11)
metal plating waste	2	(12)
circuit etchings	2	(13)
inorganic acid manufacture	2	(14)
organic acid manufacture	2	(15)
Base solutions, with pH > 10	2	(16)
caustic soda manufacture	2	(17)
nylon and similar polymer generation	2	(18)
scrubber residual	2	(19)
Heavy metals & trace metals (bonded organically & inorganically)	1	(20)
arsenic, selenium, antimony	1	(21)
mercury	2	(22)
iron, manganese, magnesium	2	(23)
zinc, cadmium, copper, chromium (trivalent)	1	(24)
chromium (hexavalent)	1	(25)
lead	1	(26)
Radioactive residues, > 3 pico curies/liter	2	(27)
uranium residuals & residuals for UF ₆ recycling	2	(28)
lanthanide series elements and rare earth salts	2	(29)
phosphate slag	2	(30)
thorium	2	(31)
radium	2	(32)
other alpha, beta & gamma emitters	2	(33)
Organics.....	1	(34)
pesticides & intermediates	2	(35)
herbicides & intermediates	2	(36)
fungicides & intermediates	2	(37)
rodenticides & intermediates	2	(38)
halogenated aliphatics	1	(39)
halogenated aromatics	2	(40)
acrylates & latex emulsions	2	(41)
PCB/PBB's	2	(42)
amides, amines, imides	1	(43)
plastizers	1	(44)
resins	1	(45)
elastomers	2	(46)
solvents polar (except water)	1	(47)
carbontetrachloride	2	(48)
trichloroethylene	2	(49)
other solvents nonpolar	1	(50)
solvents halogenated aliphatic.....	1	(51)
solvents halogenated aromatic	2	(52)
oils and oil sludges	2	(53)
esters and ethers	1	(54)
alcohols	1	(55)
ketones & aldehydes	1	(56)
dioxins	2	(57)
Inorganics	2	(58)
salts	2	(59)
mercaptans	2	(60)
Misc.....	1	(61)
pharmaceutical wastes	2	(62)
paints & pigments	1	(63)
catalysts (eg. vanadium, platinum, palladium)	1	(64)
asbestos	1	(65)
shock sensitive wastes (eg. nitrated toluenes)	2	(66)
air water reactive wastes (eg. P ₂ , aluminum chloride)	2	(67)
wastes with flash point below 100° F.....	9	(68)

Only trace amounts of heavy metals and solvents were in waste.

COMPLETE THIS FORM FOR EVERY SITE (INCLUDING THE LOCATION OF THIS FACILITY AS ONE SITE) USED FOR THE DISPOSAL OF PROCESS WASTES GENERATED BY THIS FACILITY SINCE 1950.

Company Name: ALLIED CHEMICAL CORPORATION
Facility Name: SPECIALTY CHEMICALS DIVISION - TOLEDO, OHIO
Name of Site: BROWNING FERRIS INDUSTRIAL WASTE SYSTEMS
Address of Site: 6233 HAGMAN ROAD
no. street

TOLEDO OHIO 43612
city state zip code

Name of Owner (while used by facility): BFI
Address: SAME
no. street

city state zip code

Current Owner (if different from above): SAME
Address: no. street

city state zip code

1. Location (1= the property on which facility is located; 2= off-site)..... 2 (10)
2. Ownership at time of use (1= company ownership; 2=private but not, company ownership) 3=public ownership) 2 (11)
3. Current status (1= closed; 2= still in use; 9=don't know) 2 (12)
IF CLOSED, specify year closed 19 (13-14)
4. Year first used for process waste from this facility 19 77 (15-16)
5. Year last used for process waste from this facility (enter "79" if still in use) 19 79 (17-18)
6. Total amount of process waste from this facility disposed at site:
thousand gallons (19-26)
hundred tons (27-35)
thousand cubic yards (34-41)
7. Specify type(s) of disposal method(s) used at site and whether method is still in use (1=currently in use; 2=no longer in use; 3=never used; 9=don't know)
landfill, mono industrial waste 3 (42)
landfill, mixed industrial waste 1 (43)
landfill, drummed waste 9 (44)
landfill, municipal refuse co-disposed ... 9 (45)
pits/ponds/lagoons 9 (46)
deep well injection 9 (47)
land farming 9 (48)
incineration 9 (49)
treatment (eg. neutralizing)..... 9 (50)
reprocessing/recycling 9 (51)
other (specify) 9 (52)
8. Users of this site (1=this facility; 2=this facility and other company facilities only; 3=this company and others; 9=don't know) 3 (53)

LIST NAMES AND ADDRESSES OF OTHER KNOWN USERS BELOW

Company Name: ALLIED CHEMICAL CORPORATION

Facility Name: SPECIALTY CHEMICALS DIVISION - TOLEDO, OHIO

Site Name: BROWNING FERRIS INDUSTRIAL WASTE SYSTEMS

9. Components (or characteristics) of process waste from this facility disposed at site: (1=present in waste; 2=not present in waste; 9=don't know)

FILL IN EVERY BLOCK SPACE

Acid solutions, with pH < 3.....	2	(10)
pickling liquor	2	(11)
metal plating waste	2	(12)
circuit etchings	2	(13)
inorganic acid manufacture	2	(14)
organic acid manufacture	2	(15)
Base solutions, with pH > 10	2	(16)
caustic soda manufacture	2	(17)
nylon and similar polymer generation	2	(18)
scrubber residual	2	(19)
Heavy metals & trace metals (bonded organically & inorganically)	1	(20)
arsenic, selenium, antimony	1	(21)
mercury	2	(22)
iron, manganese, magnesium	2	(23)
zinc, cadmium, copper, chromium (trivalent)	1	(24)
chromium (hexavalent)	1	(25)
lead	1	(26)
Radioactive residues, > 3 pico curies/liter	2	(27)
uranium residuals & residuals for UF ₆ recycling	2	(28)
lathanide series elements and rare earth salts	2	(29)
phosphate slag	2	(30)
thorium	2	(31)
radium	2	(32)
other alpha, beta & gamma emitters	2	(33)
Organics.....	1	(34)
pesticides & intermediates	2	(35)
herbicides & intermediates	2	(36)
fungicides & intermediates	2	(37)
rodenticides & intermediates	2	(38)
halogenated aliphatics	1	(39)
halogenated aromatics	2	(40)
acrylates & latex emulsions	2	(41)
PCB/PBB's	2	(42)
amides, amines, imides	1	(43)
plastizers	1	(44)
resins	1	(45)
elastomers	2	(46)
solvents polar (except water)	1	(47)
carbontetrachloride	2	(48)
trichloroethylene	2	(49)
other solvents nonpolar	1	(50)
solvents halogenated aliphatic.....	2	(51)
solvents halogenated aromatic	2	(52)
oils and oil sludges	2	(53)
esters and ethers	1	(54)
alcohols	1	(55)
ketones & aldehydes	1	(56)
dioxins	2	(57)
Inorganics	2	(58)
salts	2	(59)
mercaptans	2	(60)
Misc.....	1	(61)
pharmaceutical wastes	2	(62)
paints & pigments	1	(63)
catalysts (eg. vanadium, platinum, palladium)	1	(64)
asbestos	1	(65)
shock sensitive wastes (eg. nitrated toluenes)	2	(66)
air water reactive wastes (eg. P ₄ , aluminum chloride)	2	(67)
wastes with flash point below 100° F.....	2	(68)

Only trace amounts of heavy metal and solvents were in wastes.

COMPLETE THIS FORM FOR EVERY SITE (INCLUDING THE LOCATION OF THIS FACILITY AS ONE SITE) USED FOR THE DISPOSAL OF PROCESS WASTES GENERATED BY THIS FACILITY SINCE 1950.

Company Name: ALLIED CHEMICAL CORPORATION
Facility Name: SPECIALTY CHEMICALS DIVISION - TOLEDO, OHIO
Name of Site: FONDESSY OTTER CREEK ROAD
Address of Site: 876 OTTER CREEK ROAD
no. street

OREGON OHIO 43616
city state zip code

Name of Owner (while used by facility): FONDESSY ENTERPRISES INC.
Address: 876 OTTER CREEK ROAD
no. street

OREGON OHIO
city state zip code

Current Owner (if different from above): SAME
Address: _____
no. street

_____ OREGON OHIO
city state zip code

1. Location (1= the property on which facility is located; 2= off-site)..... 2 (10)
2. Ownership at time of use (1= company ownership; 2=private but not company ownership) 3=public ownership) 2 (11)
3. Current status (1= closed; 2= still in use; 9=don't know) 2 (12)
IF CLOSED, specify year closed 19 (13-14)
4. Year first used for process waste from this facility 1950 (15-16)
5. Year last used for process waste from this facility (enter "79" if still in use) EST. 1969 (17-18)
6. Total amount of process waste from this facility disposed at site:
thousand gallons (19-26)
hundred tons EST. (27-33)
thousand cubic yards (34-41)
7. Specify type(s) of disposal method(s) used at site and whether method is still in use (1=currently in use; 2=no longer in use; 3=never used; 9=don't know)
landfill, mono industrial waste 3 (42)
landfill, mixed industrial waste 1 (43)
landfill, drummed waste 1 (44)
landfill, municipal refuse co-disposed ... 9 (45)
pits/ponds/lagoons 9 (46)
deep well injection 9 (47)
land farming 9 (48)
incineration 9 (49)
treatment (eg. neutralizing)..... 9 (50)
reprocessing/recycling 9 (51)
other (specify) 9 (52)
8. Users of this site (1=this facility; 2=this facility and other company facilities only; 3=this company and others; 9=don't know) 3 (53)

LIST NAMES AND ADDRESSES OF OTHER KNOWN USERS BELOW

Allied Chemical acquired producing facility from Libbey Owens Ford in 1953.

Facility Name: SPECIALTY CHEMICALS DIVISION - TOLEDO, OHIOSite Name: FONDESSY OTTER CREEK ROAD

9. Components (or characteristics) of process waste from this facility disposed at site: (1=present in waste; 2=not present in waste; 9=don't know)

FILL IN EVERY BLOCK SPACE

Acid solutions, with pH < 3.....	2	(10)
pickling liquor	2	(11)
metal plating waste	2	(12)
circuit etchings	2	(13)
inorganic acid manufacture	2	(14)
organic acid manufacture	2	(15)
Base solutions, with pH > 10	2	(16)
caustic soda manufacture	2	(17)
nylon and similar polymer generation	2	(18)
scrubber residual	2	(19)
Heavy metals & trace metals (bonded organically & inorganically)	2	(20)
arsenic, selenium, antimony	2	(21)
mercury	2	(22)
iron, manganese, magnesium	2	(23)
zinc, cadmium, copper, chromium (trivalent)	2	(24)
chromium (hexavalent)	2	(25)
lead	2	(26)
Radioactive residues, > 3 pico curies/liter	2	(27)
uranium residuals & residuals for UF ₆ recycling	2	(28)
lathanide series elements and rare earth salts	2	(29)
phosphate slag	2	(30)
thorium	2	(31)
radium	2	(32)
other alpha, beta & gamma emitters	2	(33)
Organics.....	1	(34)
pesticides & intermediates	2	(35)
herbicides & intermediates	2	(36)
fungicides & intermediates	2	(37)
rodenticides & intermediates	2	(38)
halogenated aliphatics	1	(39)
halogenated aromatics	2	(40)
acrylates & latex emulsions	2	(41)
PCB/PBB's	2	(42)
amides, amines, imides	1	(43)
plastizers	1	(44)
resins	1	(45)
elastomers	2	(46)
solvents polar (except water)	1	(47)
carbontetrachloride	2	(48)
trichloroethylene	2	(49)
other solvents nonpolar	1	(50)
solvents halogenated aliphatic.....	1	(51)
solvents halogenated aromatic	2	(52)
oils and oil sludges	2	(53)
esters and ethers	1	(54)
alcohols	1	(55)
ketones & aldehydes	1	(56)
dioxins	2	(57)
Inorganics	2	(58)
salts	2	(59)
mercaptans	2	(60)
Misc.....	1	(61)
pharmaceutical wastes	2	(62)
paints & pigments	2	(63)
catalysts (eg. vanadium, platinum, palladium)	9	(64)
asbestos	2	(65)
shock sensitive wastes (eg. nitrated toluenes)	2	(66)
air water reactive wastes (eg. P ₄ , aluminum chloride)	2	(67)
wastes with flash point below 100° F.....	9	(68)

COMPLETE THIS FORM FOR EVERY SITE (INCLUDING THE LOCATION OF THIS FACILITY AS ONE SITE) USED FOR THE DISPOSAL OF PROCESS WASTES GENERATED BY THIS FACILITY SINCE 1950.

Company Name: ALLIED CHEMICAL CORPORATION
 Facility Name: SPECIALTY CHEMICALS DIVISION - TOLEDO, OHIO
 Name of Site: TERRY LITTLE (sold to Commercial Oil Co.)
 Address of Site:

no. street
FOSTORIA OHIO
 city state zip code

Name of Owner (while used by facility): TERRY LITTLE
 Address:

no. street
FOSTORIA OHIO
 city state zip code

Current Owner (if different from above): UNKNOWN
 Address:

no. street
 city state zip code

1. Location (1= the property on which facility is located; 2= off-site)..... 2 (10)
2. Ownership at time of use (1= company ownership; 2=private but not company ownership) 3=public ownership) 2 (11)
3. Current status (1= closed; 2= still in use; 9=don't know) 9 (12)
 IF CLOSED, specify year closed 19 (13-14)
4. Year first used for process waste from this facility EST. 1950 (15-16)
5. Year last used for process waste from this facility (enter "79" if still in use) 1970 (17-18)
6. Total amount of process waste from this facility disposed at site:
 thousand gallons (19-26)
 hundred tons EST. (27-33)
 thousand cubic yards (34-41)
7. Specify type(s) of disposal method(s) used at site and whether method is still in use (1=currently in use; 2=no longer in use; 3=never used; 9=don't know)
 landfill, mono industrial waste 9 (42)
 landfill, mixed industrial waste 9 (43)
 landfill, drummed waste 9 (44)
 landfill, municipal refuse co-disposed ... 9 (45)
 pits/ponds/lagoons 2 (46)
 deep well injection 9 (47)
 land farming 9 (48)
 incineration 9 (49)
 treatment (eg. neutralizing)..... 9 (50)
 reprocessing/recycling 2 (51)
 other (specify) 9 (52)
8. Users of this site (1=this facility; 2=this facility and other company facilities only; 3=this company and others; 9=don't know) 3 (53)

LIST NAMES AND ADDRESSES OF OTHER KNOWN USERS BELOW

Allied Chemical acquired producing facility from Libbey Owens Ford in 1953.

? also known as
 "GRIENERS" at
 5000 E. 10th

Company Name: ALLIED CHEMICAL CORPORATION

Facility Name: SPECIALTY CHEMICALS DIVISION - TOLEDO, OHIO

Site Name: TERRY LITTLE (sold to Commercial Oil Co.)

9. Components (or characteristics) of process waste from this facility disposed at site: (1=present in waste; 2=not present in waste; 9=don't know)

FILL IN EVERY BLOCK SPACE

Acid solutions, with pH < 3.....	2	(10)
pickling liquor	2	(11)
metal plating waste	2	(12)
circuit etchings	2	(13)
inorganic acid manufacture	2	(14)
organic acid manufacture	2	(15)
Base solutions, with pH > 10	2	(16)
caustic soda manufacture	2	(17)
nylon and similar polymer generation	2	(18)
scrubber residual	2	(19)
Heavy metals & trace metals (bonded organically & inorganically)	2	(20)
arsenic, selenium, antimony	2	(21)
mercury	2	(22)
iron, manganese, magnesium	2	(23)
zinc, cadmium, copper, chromium (trivalent)	2	(24)
chromium (hexavalent)	2	(25)
lead	2	(26)
Radioactive residues, > 3 pico curies/liter	2	(27)
uranium residuals & residuals for UF ₆ recycling	2	(28)
lanthanide series elements and rare earth salts	2	(29)
phosphate slag	2	(30)
thorium	2	(31)
radium	2	(32)
other alpha, beta & gamma emitters	2	(33)
Organics.....	1	(34)
pesticides & intermediates	2	(35)
herbicides & intermediates	2	(36)
fungicides & intermediates	2	(37)
rodenticides & intermediates	2	(38)
halogenated aliphatics	2	(39)
halogenated aromatics	2	(40)
acrylates & latex emulsions	2	(41)
PCB/PBB's	2	(42)
amides, amines, imides	2	(43)
plastizers	1	(44)
resins	1	(45)
elastomers	2	(46)
solvents polar (except water)	1	(47)
carbontetrachloride	2	(48)
trichloroethylene	2	(49)
other solvents nonpolar	1	(50)
solvents halogenated aliphatic.....	1	(51)
solvents halogenated aromatic	2	(52)
oils and oil sludges	2	(53)
esters and ethers	1	(54)
alcohols	1	(55)
ketones & aldehydes	1	(56)
dioxins	2	(57)
Inorganics	2	(58)
salts	2	(59)
mercaptans	2	(60)
Misc.....	2	(61)
pharmaceutical wastes	2	(62)
paints & pigments	2	(63)
catalysts (eg. vanadium, platinum, palladium)	2	(64)
asbestos	2	(65)
shock sensitive wastes (eg. nitrated toluenes)	2	(66)
air water reactive wastes (eg. P ₄ , aluminum chloride)	2	(67)
wastes with flash point below 100° F.....	9	(68)

Primarily took scrap plasticizer oils. Trace quantities of other substances only.

COMPLETE THIS FORM FOR EVERY SITE (INCLUDING THE LOCATION OF THIS FACILITY AS ONE SITE) USED FOR THE DISPOSAL OF PROCESS WASTES GENERATED BY THIS FACILITY SINCE 1950.

Company Name: ALLIED CHEMICAL CORPORATION
Facility Name: SPECIALTY CHEMICALS DIVISION - TOLEDO, OHIO
Name of Site: EVERGREEN SANITARY LANDFILL
Address of Site: 6525 WALES ROAD

no. street
WOOD COUNTY, OHIO 43619
city state zip code

Name of Owner (while used by facility): OHIO WASTE SYSTEMS INC.
Address: 6525 WALES ROAD
no. street

WOOD COUNTY, OHIO
city state zip code

Current Owner (if different from above): SAME
Address: no. street

city state zip code

1. Location (1= the property on which facility is located; 2= off-site)..... 2 (10)
2. Ownership at time of use (1= company ownership; 2=private but not, company ownership) 3=public ownership) 9 (11)
3. Current status (1= closed; 2= still in use; 9=don't know) 2 (12)
IF CLOSED, specify year closed 19 (13-14)
4. Year first used for process waste from this facility 1969 (15-16)
5. Year last used for process waste from this facility (enter "79" if still in use) 1977 (17-18)
6. Total amount of process waste from this facility disposed at site:
thousand gallons (19-26)
hundred tons (27-33)
thousand cubic yards (34-41)
7. Specify type(s) of disposal method(s) used at site and whether method is still in use (1=currently in use; 2=no longer in use; 3=never used; 9=don't know)
landfill, mono industrial waste 3 (42)
landfill, mixed industrial waste 1 (43)
landfill, drummed waste 1 (44)
landfill, municipal refuse co-disposed ... 9 (45)
pits/ponds/lagoons 9 (46)
deep well injection 9 (47)
land farming 9 (48)
incineration 9 (49)
treatment (eg. neutralizing)..... 9 (50)
reprocessing/recycling 9 (51)
other (specify) 9 (52)
8. Users of this site (1=this facility; 2=this facility and other company facilities only; 3=this company and others; 9=don't know) 3 (53)

LIST NAMES AND ADDRESSES OF OTHER KNOWN USERS BELOW

Facility Name: SPECIALTY CHEMICALS DIVISION-TOLEDO, OHIOSite Name: EVERGREEN SANITARY LANDFILL

9. Components (or characteristics) of process waste from this facility disposed at site: (1=present in waste; 2=not present in waste; 9=don't know)

FILL IN EVERY BLOCK SPACE

Acid solutions, with pH < 3.....	2	(10)
pickling liquor	2	(11)
metal plating waste	2	(12)
circuit etchings	2	(13)
inorganic acid manufacture	2	(14)
organic acid manufacture	2	(15)
Base solutions, with pH > 10	2	(16)
caustic soda manufacture	2	(17)
nylon and similar polymer generation	2	(18)
scrubber residual	2	(19)
Heavy metals & trace metals (bonded organically & inorganically)	2	(20)
arsenic, selenium, antimony	2	(21)
mercury	2	(22)
iron, manganese, magnesium	2	(23)
zinc, cadmium, copper, chromium (trivalent)	2	(24)
chromium (hexavalent)	2	(25)
lead	2	(26)
Radioactive residues, > 3 pico curies/liter	2	(27)
uranium residuals & residuals for UF ₆ recycling	2	(28)
lathanide series elements and rare earth salts	2	(29)
phosphate slag	2	(30)
thorium	2	(31)
radium	2	(32)
other alpha, beta & gamma emitters	2	(33)
Organics.....	1	(34)
pesticides & intermediates	2	(35)
herbicides & intermediates	2	(36)
fungicides & intermediates	2	(37)
rodenticides & intermediates	2	(38)
halogenated aliphatics	1	(39)
halogenated aromatics	2	(40)
acrylates & latex emulsions	2	(41)
PCB/PBB's	2	(42)
amides, amines, imides	2	(43)
plastizers	2	(44)
resins	1	(45)
elastomers	2	(46)
solvents polar (except water)	1	(47)
carbontetrachloride	2	(48)
trichloroethylene	2	(49)
other solvents nonpolar	1	(50)
solvents halogenated aliphatic.....	1	(51)
solvents halogenated aromatic	2	(52)
oils and oil sludges	2	(53)
esters and ethers	1	(54)
alcohols	1	(55)
ketones & aldehydes	2	(56)
dioxins	2	(57)
Inorganics	2	(58)
salts	2	(59)
mercaptans	2	(60)
Misc.....	1	(61)
pharmaceutical wastes	2	(62)
paints & pigments	2	(63)
catalysts (eg. vanadium, platinum, palladium)	2	(64)
asbestos	1	(65)
shock sensitive wastes (eg. nitrated toluenes)	2	(66)
air water reactive wastes (eg. P ₄ , aluminum chloride)	2	(67)
wastes with flash point below 100° F.....	9	(68)

Company Name: ALLIED CHEMICAL CORPORATION

Facility Name: SPECIALTY CHEMICALS DIVISION-TOLEDO, OHIO

Site Name: EVERGREEN SANITARY LANDFILL

9. Components (or characteristics) of process waste from this facility disposed at site: (1=present in waste; 2=not present in waste; 9=don't know)

FILL IN EVERY BLOCK SPACE

Acid solutions, with pH < 3.....	2	(10)
pickling liquor	2	(11)
metal plating waste	2	(12)
circuit etchings	2	(13)
inorganic acid manufacture	2	(14)
organic acid manufacture	2	(15)
Base solutions, with pH > 10	2	(16)
caustic soda manufacture	2	(17)
nylon and similar polymer generation	2	(18)
scrubber residual	2	(19)
Heavy metals & trace metals (bonded organically & inorganically)	2	(20)
arsenic, selenium, antimony	2	(21)
mercury	2	(22)
iron, manganese, magnesium	2	(23)
zinc, cadmium, copper, chromium (trivalent)	2	(24)
chromium (hexavalent)	2	(25)
lead	2	(26)
Radioactive residues, > 3 pico curies/liter	2	(27)
uranium residuals & residuals for UF ₆ recycling	2	(28)
lathanide series elements and rare earth salts	2	(29)
phosphate slag	2	(30)
thorium	2	(31)
radium	2	(32)
other alpha, beta & gamma emitters	2	(33)
Organics.....	1	(34)
pesticides & intermediates	2	(35)
herbicides & intermediates	2	(36)
fungicides & intermediates	2	(37)
rodenticides & intermediates	2	(38)
halogenated aliphatics	1	(39)
halogenated aromatics	2	(40)
acrylates & latex emulsions	2	(41)
PCB/PBB's	2	(42)
amides, amines, imides	2	(43)
plastizers	2	(44)
resins	1	(45)
elastomers	2	(46)
solvents polar (except water)	1	(47)
carbontetrachloride	2	(48)
trichloroethylene	2	(49)
other solvents nonpolar	1	(50)
solvents halogenated aliphatic.....	1	(51)
solvents halogenated aromatic	2	(52)
oils and oil sludges	2	(53)
esters and ethers	1	(54)
alcohols	1	(55)
ketones & aldehydes	2	(56)
dioxins	2	(57)
Inorganics	2	(58)
salts	2	(59)
mercaptans	2	(60)
Misc.....	1	(61)
pharmaceutical wastes	2	(62)
paints & pigments	2	(63)
catalysts (eg. vanadium, platinum, palladium)	2	(64)
asbestos	1	(65)
shock sensitive wastes (eg. nitrated toluenes)	2	(66)
air water reactive wastes (eg. P ₄ , aluminum chloride)	2	(67)
wastes with flash point below 100° F.....	9	(68)

COMPLETE THIS FORM FOR EVERY SITE (INCLUDING THE LOCATION OF THIS FACILITY AS ONE SITE) USED FOR THE DISPOSAL OF PROCESS WASTES GENERATED BY THIS FACILITY SINCE 1950.

Company Name: ALLIED CHEMICAL CORPORATION
Facility Name: SPECIALTY CHEMICALS DIVISION - TOLEDO, OHIO
Name of Site: WAYNE DISPOSAL COMPANY
Address of Site: _____
no. street

YPSILANTI MICHIGAN
city state zip code

Name of Owner (while used by facility): WAYNE DISPOSAL COMPANY
Address: _____
no. street

YPSILANTI MICHIGAN
city state zip code

Current Owner (if different from above): SAME
Address: _____
no. street

_____ city state zip code

1. Location (1= the property on which facility is located; 2= off-site)..... 2 (10)
2. Ownership at time of use (1= company ownership; 2=private but not company ownership) 3=public ownership) 2 (11)
3. Current status (1= closed; 2= still in use; 9=don't know) 9 (12)
IF CLOSED, specify year closed 197 (13-14)
4. Year first used for process waste from this facility EST. 1977 (15-16)
5. Year last used for process waste from this facility (enter "79" if still in use) 1979 (17-18)
6. Total amount of process waste from this facility disposed at site:
thousand gallons 1 1 1 1 1 1 1 1 1 1 (19-26)
hundred tons 1 1 1 1 1 1 1 1 1 1 (27-33)
thousand cubic yards 1 1 1 1 1 1 1 1 1 1 (34-41)
7. Specify type(s) of disposal method(s) used at site and whether method is still in use (1=currently in use; 2=no longer in use; 3=never used; 9=don't know)
landfill, mono industrial waste 2 (42)
landfill, mixed industrial waste 1 (43)
landfill, drummed waste 9 (44)
landfill, municipal refuse co-disposed ... 9 (45)
pits/ponds/lagoons 9 (46)
deep well injection 9 (47)
land farming 9 (48)
incineration 9 (49)
treatment (eg. neutralizing)..... 9 (50)
reprocessing/recycling 9 (51)
other (specify) 9 (52)
8. Users of this site (1=this facility; 2=this facility and other company facilities only; 3=this company and others; 9=don't know) 3 (53)

LIST NAMES AND ADDRESSES OF OTHER KNOWN USERS BELOW

Company Name: ALLIED CHEMICAL CORPORATION

Facility Name: SPECIALTY CHEMICALS DIVISION - TOLEDO, OHIO

Site Name: WAYNE DISPOSAL COMPANY

9. Components (or characteristics) of process waste from this facility disposed at site: (1=present in waste; 2=not present in waste; 9=don't know)

FILL IN EVERY BLOCK SPACE

Acid solutions, with pH < 3.....	2	(10)
pickling liquor	2	(11)
metal plating waste	2	(12)
circuit etchings	2	(13)
inorganic acid manufacture	2	(14)
organic acid manufacture	2	(15)
Base solutions, with pH > 10	2	(16)
caustic soda manufacture	2	(17)
nylon and similar polymer generation	2	(18)
scrubber residual	2	(19)
Heavy metals & trace metals (bonded organically & inorganically)	2	(20)
arsenic, selenium, antimony	2	(21)
mercury	2	(22)
iron, manganese, magnesium	2	(23)
zinc, cadmium, copper, chromium (trivalent)	2	(24)
chromium (hexavalent)	2	(25)
lead	2	(26)
Radioactive residues, > 3 pico curies/liter	2	(27)
uranium residuals & residuals for UF ₆ recycling	2	(28)
lathanide series elements and rare earth salts	2	(29)
phosphate slag	2	(30)
thorium	2	(31)
radium	2	(32)
other alpha, beta & gamma emitters	2	(33)
Organics.....	1	(34)
pesticides & intermediates	2	(35)
herbicides & intermediates	2	(36)
fungicides & intermediates	2	(37)
rodenticides & intermediates	2	(38)
halogenated aliphatics	2	(39)
halogenated aromatics	2	(40)
acrylates & latex emulsions	2	(41)
PCB/PBB's	2	(42)
amides, amines, imides	1	(43)
plastizers	2	(44)
resins	1	(45)
elastomers	2	(46)
solvents polar (except water)	2	(47)
carbontetrachloride	2	(48)
trichloroethylene	2	(49)
other solvents nonpolar	2	(50)
solvents halogenated aliphatic.....	2	(51)
solvents halogenated aromatic	2	(52)
oils and oil sludges	2	(53)
esters and ethers	2	(54)
alcohols	2	(55)
ketones & aldehydes	1	(56)
dioxins	2	(57)
Inorganics	2	(58)
salts	2	(59)
mercaptans	2	(60)
Misc.....	2	(61)
pharmaceutical wastes	2	(62)
paints & pigments	2	(63)
catalysts (eg. vanadium, platinum, palladium)	2	(64)
asbestos	2	(65)
shock sensitive wastes (eg. nitrated toluenes)	2	(66)
air water reactive wastes (eg. P ₄ , aluminum chloride)	2	(67)
wastes with flash point below 100° F.....	2	(68)

COMPLETE THIS FORM FOR EVERY SITE (INCLUDING THE LOCATION OF THIS FACILITY AS ONE SITE) USED FOR THE DISPOSAL OF PROCESS WASTES GENERATED BY THIS FACILITY SINCE 1950.

Company Name: ALLIED CHEMICAL CORPORATION
Facility Name: SPECIALTY CHEMICALS DIVISION - TOLEDO, OHIO
Name of Site: WAYNE DISPOSAL COMPANY
Address of Site:

no. street

RAWSONVILLE, MICHIGAN
city state zip code

Name of Owner (while used by facility): WAYNE DISPOSAL COMPANY
Address:

no. street

RAWSONVILLE, MICHIGAN
city state zip code

Current Owner (if different from above): SAME

Address:

no. street

city state zip code

1. Location (1= the property on which facility is located; 2= off-site)..... 2 (10)
2. Ownership at time of use (1= company ownership; 2=private but not, company ownership) 3=public ownership) 2 (11)
3. Current status (1= closed; 2= still in use; 9=don't know) 9 (12)
IF CLOSED, specify year closed 19 (13-14)
4. Year first used for process waste from this facility EST. 19 71 (15-16)
5. Year last used for process waste from this facility (enter "79" if still in use) 19 79 (17-18)
6. Total amount of process waste from this facility disposed at site:
thousand gallons (19-26)
hundred tons (27-33) 400
thousand cubic yards (34-41) 100
7. Specify type(s) of disposal method(s) used at site and whether method is still in use (1=currently in use; 2=no longer in use; 3=never used; 9=don't know)
landfill, mono industrial waste 2 (42)
landfill, mixed industrial waste 1 (43)
landfill, drummed waste 9 (44)
landfill, municipal refuse co-disposed ... 9 (45)
pits/ponds/lagoons 9 (46)
deep well injection 9 (47)
land farming 9 (48)
incineration 9 (49)
treatment (eg. neutralizing)..... 9 (50)
reprocessing/recycling 9 (51)
other (specify) 9 (52)
8. Users of this site (1=this facility; 2=this facility and other company facilities only; 3=this company and others; 9=don't know) 3 (53)

LIST NAMES AND ADDRESSES OF OTHER KNOWN USERS BELOW

Company Name: ALLIED CHEMICAL CORPORATION

Facility Name: SPECIALTY CHEMICALS DIVISION - TOLEDO, OHIO

Site Name: WAYNE DISPOSAL COMPANY (Rawsonville, Michigan)

9. Components (or characteristics) of process waste from this facility disposed at site: (1=present in waste; 2=not present in waste; 9=don't know)

FILL IN EVERY BLOCK SPACE

Acid solutions, with pH < 3.....	2	(10)
pickling liquor	2	(11)
metal plating waste	2	(12)
circuit etchings	2	(13)
inorganic acid manufacture	2	(14)
organic acid manufacture	2	(15)
Base solutions, with pH > 10	2	(16)
caustic soda manufacture	2	(17)
nylon and similar polymer generation	2	(18)
scrubber residual	2	(19)
Heavy metals & trace metals (bonded organically & inorganically)	2	(20)
arsenic, selenium, antimony	2	(21)
mercury	2	(22)
iron, manganese, magnesium	2	(23)
zinc, cadmium, copper, chromium (trivalent)	2	(24)
chromium (hexavalent)	2	(25)
lead	2	(26)
Radioactive residues, > 3 pico curies/liter	2	(27)
uranium residuals & residuals for UF ₆ recycling	2	(28)
lanthanide series elements and rare earth salts	2	(29)
phosphate slag	2	(30)
thorium	2	(31)
radium	2	(32)
other alpha, beta & gamma emitters	2	(33)
Organics.....	1	(34)
pesticides & intermediates	2	(35)
herbicides & intermediates	2	(36)
fungicides & intermediates	2	(37)
rodenticides & intermediates	2	(38)
halogenated aliphatics	2	(39)
halogenated aromatics	2	(40)
acrylates & latex emulsions	2	(41)
PCB/PBB's	2	(42)
amides, amines, imides	1	(43)
plastizers	2	(44)
resins	1	(45)
elastomers	2	(46)
solvents polar (except water)	2	(47)
carbontetrachloride	2	(48)
trichloroethylene	2	(49)
other solvents nonpolar	2	(50)
solvents halogenated aliphatic.....	2	(51)
solvents halogenated aromatic	2	(52)
oils and oil sludges	2	(53)
esters and ethers	2	(54)
alcohols	2	(55)
ketones & aldehydes	1	(56)
dioxins	2	(57)
Inorganics	2	(58)
salts	2	(59)
mercaptans	2	(60)
Misc.....	2	(61)
pharmaceutical wastes	2	(62)
paints & pigments	2	(63)
catalysts (eg. vanadium, platinum, palladium)	2	(64)
asbestos	2	(65)
shock sensitive wastes (eg. nitrated toluenes)	2	(66)
air water reactive wastes (eg. P ₄ , aluminum chloride)	2	(67)
wastes with flash point below 100° F.....	2	(68)

COMPLETE THIS FORM FOR EVERY SITE (INCLUDING THE LOCATION OF THIS FACILITY AS ONE SITE) USED FOR THE DISPOSAL OF PROCESS WASTES GENERATED BY THIS FACILITY SINCE 1950.

Company Name: ALLIED CHEMICAL CORPORATION
Facility Name: SPECIALTY CHEMICALS DIVISION - TOLEDO, OHIO
Name of Site: LIQUID DISPOSAL COMPANY
Address of Site:

no. street
UTICA MICHIGAN
city state zip code

Name of Owner (while used by facility): LIQUID DISPOSAL COMPANY
Address:

no. street
UTICA MICHIGAN
city state zip code

Current Owner (if different from above): SAME
Address:

no. street
city state zip code

1. Location (1= the property on which facility is located; 2= off-site)..... 2 (10)
2. Ownership at time of use (1= company ownership; 2=private but not company ownership) 3=public ownership) 2 (11)
3. Current status (1= closed; 2= still in use; 9=don't know) 2 (12)
IF CLOSED, specify year closed 19 (13-14)
4. Year first used for process waste from this facility EST. 19 77 (15-16)
5. Year last used for process waste from this facility (enter "79" if still in use) 19 79 (17-18)
6. Total amount of process waste from this facility disposed at site:
thousand gallons (19-26)
hundred tons 0 (27-33)
thousand cubic yards (34-41)
7. Specify type(s) of disposal method(s) used at site and whether method is still in use (1=currently in use; 2=no longer in use; 3=never used; 9=don't know)
landfill, mono industrial waste 9 (42)
landfill, mixed industrial waste 9 (43)
landfill, drummed waste 9 (44)
landfill, municipal refuse co-disposed ... 9 (45)
pits/ponds/lagoons 9 (46)
deep well injection 9 (47)
land farming 9 (48)
incineration 1 (49)
treatment (eg. neutralizing)..... 9 (50)
reprocessing/recycling 9 (51)
other (specify) (52)
8. Users of this site (1=this facility; 2=this facility and other company facilities only; 3=this company and others; 9=don't know) 9 (53)

LIST NAMES AND ADDRESSES OF OTHER KNOWN USERS BELOW

Company Name: ALLIED CHEMICAL CORPORATION

Facility Name: SPECIALTY CHEMICALS CORPORATION

Site Name: LIQUID DISPOSAL COMPANY

9. Components (or characteristics) of process waste from this facility disposed at site: (1=present in waste; 2=not present in waste; 9=don't know)

FILL IN EVERY BLOCK SPACE

Acid solutions, with pH < 3	2	(10)
pickling liquor	2	(11)
metal plating waste	2	(12)
circuit etchings	2	(13)
inorganic acid manufacture	2	(14)
organic acid manufacture	2	(15)
Base solutions, with pH > 10	2	(16)
caustic soda manufacture	2	(17)
nylon and similar polymer generation	2	(18)
scrubber residual	2	(19)
Heavy metals & trace metals (bonded organically & inorganically)	2	(20)
arsenic, selenium, antimony	2	(21)
mercury	2	(22)
iron, manganese, magnesium	2	(23)
zinc, cadmium, copper, chromium (trivalent)	2	(24)
chromium (hexavalent)	2	(25)
lead	2	(26)
Radioactive residues, > 3 pico curies/liter	2	(27)
uranium residuals & residuals for UF ₆ recycling	2	(28)
lathanide series elements and rare earth salts	2	(29)
phosphate slag	2	(30)
thorium	2	(31)
radium	2	(32)
other alpha, beta & gamma emitters	2	(33)
Organics	1	(34)
pesticides & intermediates	2	(35)
herbicides & intermediates	2	(36)
fungicides & intermediates	2	(37)
rodenticides & intermediates	2	(38)
halogenated aliphatics	2	(39)
halogenated aromatics	2	(40)
acrylates & latex emulsions	2	(41)
PCB/PBB's	2	(42)
amides, amines, imides	2	(43)
plastizers	2	(44)
resins	2	(45)
elastomers	2	(46)
solvents polar (except water)	2	(47)
carbontetrachloride	2	(48)
trichloroethylene	2	(49)
other solvents nonpolar	2	(50)
solvents halogenated aliphatic	2	(51)
solvents halogenated aromatic	2	(52)
oils and oil sludges	2	(53)
esters and ethers	2	(54)
alcohols	2	(55)
ketones & aldehydes	1	(56)
dioxins	2	(57)
Inorganics	2	(58)
salts	2	(59)
mercaptans	2	(60)
Misc	2	(61)
pharmaceutical wastes	2	(62)
paints & pigments	2	(63)
catalysts (eg. vanadium, platinum, palladium)	2	(64)
asbestos	2	(65)
shock sensitive wastes (eg. nitrated toluenes)	2	(66)
air water reactive wastes (eg. P ₄ , aluminum chloride)	2	(67)
wastes with flash point below 100° F.	2	(68)

COMPLETE THIS FORM FOR EVERY SITE (INCLUDING THE LOCATION OF THIS FACILITY AS ONE SITE) USED FOR THE DISPOSAL OF PROCESS WASTES GENERATED BY THIS FACILITY SINCE 1950.

Company Name: ALLIED CHEMICAL CORPORATION
Facility Name: SPECIALTY CHEMICALS DIVISION
Name of Site: SWAN CREEK LANDFILL
Address of Site: GLENDAL AVENUE AT SWAN CREEK
no. street

TOLEDO OHIO
city state zip code

Name of Owner (while used by facility): CONSTABLE BIGGS
Address: GLENDAL AVENUE
no. street

TOLEDO OHIO
city state zip code

Current Owner (if different from above): TOLEDO METROPOLITAN PARK SYSTEM
Address: GLENDAL AVENUE AT SWAN CREEK
no. street

TOLEDO OHIO 43614
city state zip code

1. Location (1= the property on which facility is located; 2= off-site)..... 2 (10)
2. Ownership at time of use (1= company ownership; 2=private but not company ownership) 3=public ownership) 2 (11)
3. Current status (1= closed; 2= still in use; 9=don't know) 1 (12)
IF CLOSED, specify year closed UNKNOWN... 19 (13-14)
4. Year first used for process waste from this facility UNKNOWN... 19 (15-16)
5. Year last used for process waste from this facility (enter "79" if still in use) EST. 1971 (17-18)
6. Total amount of process waste from this facility disposed at site:
thousand gallons (19-25)
hundred tons EST. 15 (27-33)
thousand cubic yards (34-41)
7. Specify type(s) of disposal method(s) used at site and whether method is still in use (1=currently in use; 2=no longer in use; 3=never used; 9=don't know)
landfill, mono industrial waste 3 (42)
landfill, mixed industrial waste 2 (43)
landfill, drummed waste 9 (44)
landfill, municipal refuse co-disposed ... 9 (45)
pits/ponds/lagoons 9 (46)
deep well injection 9 (47)
land farming 9 (48)
incineration 9 (49)
treatment (eg. neutralizing)..... 9 (50)
reprocessing/recycling 9 (51)
other (specify) (52)
8. Users of this site (1=this facility; 2=this facility and other company facilities only; 3=this company and others; 9=don't know) 3 (53)

LIST NAMES AND ADDRESSES OF OTHER KNOWN USERS BELOW

Company Name: ALLIED CHEMICAL CORPORATION

Facility Name: SPECIALTY CHEMICALS DIVISION - TOLEDO, OHIO

Site Name: SWAN CREEK LANDFILL

9. Components (or characteristics) of process waste from this facility disposed at site: (1=present in waste; 2=not present in waste; 9=don't know)

FILL IN EVERY BLOCK SPACE

Acid solutions, with pH < 3	2	(10)
pickling liquor	2	(11)
metal plating waste	2	(12)
circuit etchings	2	(13)
inorganic acid manufacture	2	(14)
organic acid manufacture	2	(15)
Base solutions, with pH > 10	2	(16)
caustic soda manufacture	2	(17)
nylon and similar polymer generation	2	(18)
scrubber residual	2	(19)
Heavy metals & trace metals (bonded organically & inorganically)	1	(20)
arsenic, selenium, antimony	2	(21)
mercury	2	(22)
iron, manganese, magnesium	2	(23)
zinc, cadmium, copper, chromium (trivalent)	1	(24)
chromium (hexavalent)	1	(25)
lead	1	(26)
Radioactive residues, > 3 pico curies/liter	2	(27)
uranium residuals & residuals for UF ₆ recycling	2	(28)
lanthanide series elements and rare earth salts	2	(29)
phosphate slag	2	(30)
thorium	2	(31)
radium	2	(32)
other alpha, beta & gamma emitters	2	(33)
Organics	1	(34)
pesticides & intermediates	2	(35)
herbicides & intermediates	2	(36)
fungicides & intermediates	2	(37)
rodenticides & intermediates	2	(38)
halogenated aliphatics	2	(39)
halogenated aromatics	2	(40)
acrylates & latex emulsions	2	(41)
PCB/PBB's	2	(42)
amides, amines, imides	1	(43)
plastizers	2	(44)
resins	1	(45)
elastomers	2	(46)
solvents polar (except water)	2	(47)
carbontetrachloride	2	(48)
trichloroethylene	2	(49)
other solvents nonpolar	2	(50)
solvents halogenated aliphatic	2	(51)
solvents halogenated aromatic	2	(52)
oils and oil sludges	2	(53)
esters and ethers	2	(54)
alcohols	2	(55)
ketones & aldehydes	1	(56)
dioxins	2	(57)
Inorganics	2	(58)
salts	2	(59)
mercaptans	2	(60)
Misc	2	(61)
pharmaceutical wastes	2	(62)
paints & pigments	2	(63)
catalysts (eg. vanadium, platinum, palladium)	2	(64)
asbestos	2	(65)
shock sensitive wastes (eg. nitrated toluenes)	2	(66)
air water reactive wastes (eg. P ₄ , aluminum chloride)	2	(67)
wastes with flash point below 100° F	2	(68)

COMPLETE THIS FORM FOR EVERY SITE (INCLUDING THE LOCATION OF THIS FACILITY AS ONE SITE) USED FOR THE DISPOSAL OF PROCESS WASTES GENERATED BY THIS FACILITY SINCE 1950.

Company Name: ALLIED CHEMICAL CORPORATION
Facility Name: SPECIALTY CHEMICALS DIVISION
Name of Site: NUCLEAR ENGINEERING CLASS I LANDFILL
Address of Site: _____
no. street

SHEFFIELD ILLINOIS 61361
city state zip code

Name of Owner (while used by facility): NUCLEAR ENGINEERING COMPANY INC.
Address: P.O. Box 158
no. street

SHEFFIELD, ILLINOIS 61361
city state zip code

Current Owner (if different from above): SAME
Address: _____
no. street

city state zip code

1. Location (1= the property on which facility is located; 2= off-site)..... 2 (10)
2. Ownership at time of use (1= company ownership; 2=private but not company ownership) 3=public ownership) 2 (11)
3. Current status (1= closed; 2= still in use; 9=don't know) 2 (12)
IF CLOSED, specify year closed 197 (13-14)
4. Year first used for process waste from this facility 1978 (15-16)
5. Year last used for process waste from this facility (enter "79" if still in use) 1978 (17-18)
6. Total amount of process waste from this facility disposed at site:
thousand gallons 1 1 1 1 1 1 1 1 (19-26)
hundred tons 1 1 1 1 1 1 1 1 0 (27-33)
thousand cubic yards 1 1 1 1 1 1 1 1 (34-41)
7. Specify type(s) of disposal method(s) used at site and whether method is still in use (1=currently in use; 2=no longer in use; 3=never used; 9=don't know)
landfill, mono industrial waste 3 (42)
landfill, mixed industrial waste 1 (43)
landfill, drummed waste 9 (44)
landfill, municipal refuse co-disposed ... 9 (45)
pits/ponds/lagoons 9 (46)
deep well injection 9 (47)
land farming 9 (48)
incineration 9 (49)
treatment (eg. neutralizing)..... 9 (50)
reprocessing/recycling 9 (51)
other (specify) 9 (52)
8. Users of this site (1=this facility; 2=this facility and other company facilities only; 3=this company and others; 9=don't know) 3 (53)

LIST NAMES AND ADDRESSES OF OTHER KNOWN USERS BELOW

Company Name: ALLIED CHEMICAL CORPORATION

Facility Name: SPECIALTY CHEMICALS DIVISION-TOLEDO, OHIO

Site Name: NUCLEAR ENGINEERING CLASS I LANDFILL

9. Components (or characteristics) of process waste from this facility disposed at site: (1=present in waste; 2=not present in waste; 9=don't know)

FILL IN EVERY BLOCK SPACE

Acid solutions, with pH < 3.....	2	(10)
pickling liquor	2	(11)
metal plating waste	2	(12)
circuit etchings	2	(13)
inorganic acid manufacture	2	(14)
organic acid manufacture	2	(15)
Base solutions, with pH > 10	2	(16)
caustic soda manufacture	2	(17)
nylon and similar polymer generation	2	(18)
scrubber residual	2	(19)
Heavy metals & trace metals (bonded organically & inorganically)	2	(20)
arsenic, selenium, antimony	2	(21)
mercury	2	(22)
iron, manganese, magnesium	2	(23)
zinc, cadmium, copper, chromium (trivalent)	2	(24)
chromium (hexavalent)	2	(25)
lead	2	(26)
Radioactive residues, > 3 pico curies/liter	2	(27)
uranium residuals & residuals for UF ₆ recycling	2	(28)
lathanide series elements and rare earth salts	2	(29)
phosphate slag	2	(30)
thorium	2	(31)
radium	2	(32)
other alpha, beta & gamma emitters	2	(33)
Organics.....	1	(34)
pesticides & intermediates	2	(35)
herbicides & intermediates	2	(36)
fungicides & intermediates	2	(37)
rodenticides & intermediates	2	(38)
halogenated aliphatics	2	(39)
halogenated aromatics	2	(40)
acrylates & latex emulsions	2	(41)
PCB/PBB's	2	(42)
amides, amines, imides	2	(43)
plastizers	2	(44)
resins	2	(45)
elastomers	2	(46)
solvents polar (except water)	2	(47)
carbontetrachloride	2	(48)
trichloroethylene	2	(49)
other solvents nonpolar	2	(50)
solvents halogenated aliphatic.....	2	(51)
solvents halogenated aromatic	2	(52)
oils and oil sludges	2	(53)
esters and others	2	(54)
alcohols	2	(55)
ketones & aldehydes	2	(56)
dioxins	2	(57)
Inorganics	2	(58)
salts	2	(59)
mercaptans	2	(60)
Misc.....	1	(61)
pharmaceutical wastes	2	(62)
paints & pigments	1	(63)
catalysts (eg. vanadium, platinum, palladium)	2	(64)
asbestos	2	(65)
shock sensitive wastes (eg. nitrated toluenes)	2	(66)
air water reactive wastes (eg. P ₄ , aluminum chloride)	2	(67)
wastes with flash point below 100° F.....	2	(68)

Note: Only material disposed at this site was a 25 pound package of Benzidene Yellow pigment.

PROVIDE A COMPLETE LIST OF ALL FIRMS AND INDEPENDENT CONTRACTORS, INCLUDING THE COMPANY AND ITS AFFILIATES AND SUBSIDIARIES, USED TO REMOVE PROCESS WASTES FROM THIS FACILITY SINCE 1950.

Company Name: ALLIED CHEMICAL CORPORATION

Facility Name: SPECIALTY CHEMICALS DIVISION - TOLEDO

<u>Name of Firm or Contractor</u>	<u>Address</u>	<u>ICC # (If Known)</u>	<u>Years Used</u>
ALLIED CHEMICAL CORPORATION	2829 GLENDALE AVENUE TOLEDO, OHIO 43614		1950-1979
BROWNING FERRIS INDUSTRIES	6233 HAGMAN RD. TOLEDO, OHIO		1977-1979
TERRY LITTLE CORPORATION	FOSTORIA, OHIO		1950-1968
COMMERCIAL OIL COMPANY	FOSTORIA, OHIO		1968-1970
FONDESSY COMPANY	876 OTTER CREEK ROAD OREGON, OHIO		1950-1969
J. L. SPRADLEN COMPANY	1820 WOODMORE STREET TOLEDO, OHIO		1969-1977
BENTON SANITATION	P.O. BOX 654 TOLEDO, OHIO		1975-1976

THERE IS NO FORM D SUPPLEMENTAL HAULER INFORMATION FOR THIS LOCATION.



MEMORANDUM

HAS HANDWRITTEN
NOTES!

DATE: May 30, 1979

SUBJECT: PAST PRACTICES FOR DISPOSAL OF WASTE MATERIALS

TO: R. J. Donovan
J. P. Evans
E. L. Kratzman
W. H. von Harling
B. J. Schaller

Per a request by the Congressional Subcommittee on Oversight and Investigations, we were asked to fill out a survey covering our waste disposal practices since 1950. Our records since 1973 are no longer available, thus much of the information was obtained through interviews with present and past employees.

The following is a general overview from the information obtained from several employees. Please review same and let us know by June 5th if you are in general agreement.

GENERAL WASTE

Most of our general waste is collected in compactors and hauled by our employees to landfills. The sites used since 1950 are:

1. Western or South Street Dump - 1950-1957
2. Consaul Street Dump - 1957-1959
3. Dura Dump Landfill - 1959-1965
4. Kings Road Landfill - 1965-1973
5. Westover Landfill - 1973-Present

In addition, when our compactors were out of order, R. Donovan has had BFI haul some waste to their Hagman Road Landfill.

COATING RESIN WASTE

When the Coating Resin Plant was in operations, Fondessy took most of the plant waste other than plasticizing oil and general lubricating oils.

These wastes mostly consisted of filter press waste, mixer clean waste, gelled resin waste and sometimes spent solvents.

Terry Little took some plasticizing and other oil products waste during the period the Coating Resin Plant was in operations.

After the Coating Resin Plant ceased operations, J. L. Spradlin Company took the mixer clean waste and flammable waste to the Evergreen Landfill in Wood County.

5/30/79

OTHER

From Maintenance records it was determined that Roto Roter cleaned the Molding Compound East Sump on at least one occasion and BFI on another.

BFI has also cleaned the formaldehyde storage tank.

We could find no records on the clean-out and disposal of material from the roto-cone pond. However it was recalled that on at least one occasion the material was taken to a dump on Glendale Avenue owned by Constable Biggs.

W. R. Mauter

W. R. Mauter

WRM:bw

cc: R. H. Wholf

P.S

B.S.F

The memo on "Past Practices for Disposal of Waste Materials" is ~~true~~ essentially true as stated.

John P. Evans

Content of memo appears to be correct, no information which would indicate differently known to me. Wootkins 6/8/79

To the best of my recollection above statements are factual.

B. G. Schell

Information as presented is true to my best recollection.
B. G. Schell

E. KRATZMAN

4/30/79

1958 - To 1969

Suggest J EVAN might know some of
info needed.

Terry Little a local dispose haggled
Plasticizer waste - on one occasion
(^{plasticizer with Carbon} crude oily carbon) was known to
have dumped load illegally into storm
and sewer went to water basin which
damaged beds in river -

butyl acetate waste may have been sent to
some one for incineration -

some as above took some unusable
(^{recovered spirits})

mainly 3 years around 1960-1965
Solid - ph - mal. anhydride - ^{butylated} filter press ^{resins}
wax - filter cake - floor sweeping -
if (spoil carbon contained plasticizer) was
sent to destruction for reprocessing
(maybe went into making rubber compounds)

phenol (spill went to sewer at
25# / day - R Ray may have some
contact) did not go

recycling
~~any~~ acid - tar acid did not
go to landfill - were disposed of
by bleeding to sewer.

Plaster Solutions Wash Solutions from plastering process
went to settling basin - then sent to
landfill with some sludge.

combined settling tank to take up
plastering sol. - ~~plaster~~

gelled slurry ⁴ ~~2~~ 3 batches went to
landfill - set up with

Waste to Freedom - 2000 waste.

~~Waste~~ ^{Waste}

Used filter cake waste sent to
water basin to prevent soiling.

Plaster waste some overseas other
to drum then to landfill - if paper.
Most of slurry waste recovered.

~~Kelly - 10/10/10~~

Altho. 400 waste to Landfill - maybe
city dump until closed for collecting?
(city dump did not send resin -
solvents)

Empty drum - same. Had 1000 waste
cont. of resin sent to J. Blom

E. L. Kratzman

HAND OR TYPEWRITE YOUR MESSAGE.
SNAP OUT CANARY DUPLICATE COPY.
FORWARD ORIGINAL AND TRIPPLICATE COPIES INTACT TO ADDRESSEE WHO WILL REPLY IN LOWER PORTION OF FORM. RETURN ORIGINAL AND RE-
TURNING PINK TRIPPLICATE COPY TO ORIGINATOR.

RECEIVED



Allied Chemical Corporation
Inter-Office Communication

JUN 5 1979

R. H. WHOLF

→ TO RH Wholf LOCATION _____ DATE 6/5/79
FROM W. von Horling LOCATION _____
SUBJECT Past practices for Disposal of Waste Materials

Bob - I read your letter and am not aware
of additional or different information.

SIGNATURE

W. von Horling
DATE

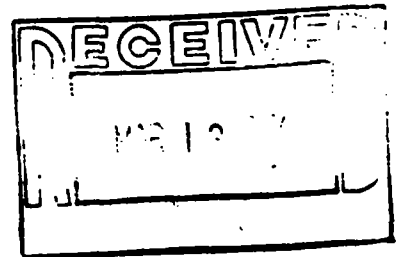
REPLY

SIGNATURE

SUBCOMMITTEE ON OVERSIGHT AND INVESTIGATIONS
OF
U. S. HOUSE COMMITTEE ON INTERSTATE AND FOREIGN COMMERCE

INVESTIGATION
OF
CHEMICAL PROCESS WASTE DISPOSAL PRACTICES

I N S T R U C T I O N S
F O R A N S W E R I N G
Q U E S T I O N N A I R E S



Prepared by Allied Chemical Corporate
Environmental Affairs and Law Departments

May 4, 1979

On April 18, 1979, the United States House of Representatives Subcommittee on Oversight and Investigations (the "SOI") of the Committee on Interstate and Foreign Commerce sent a request to John T. Conner, Chairman of the Board, and to 49 other major chemical companies for information concerning the disposal of chemical process wastes since 1950. The request is part of an SOI investigation of problems associated with the disposal of industrial waste materials.

In its request, the SOI asks for a great deal of information which must be submitted in a relatively short time, i.e. by June 29, 1979.

This project will require much time and effort on the part of Company personnel and will involve the expenditure of many thousands of dollars. As a good corporate citizen Allied Chemical will make a good faith effort to honor the SOI request. We wish to cooperate with and assist the SOI in its legislative efforts concerning past waste disposal practices.

Several of the people who helped prepare these instructions attended the April 27, 1979 SOI staff conference for representatives of the 50 companies to whom the requests were sent. During the conference, the SOI staff helped to clarify a number of the ambiguities which the SOI questionnaire presented. These instructions were prepared in the light of those clarifications. They are also based upon some interpretations which the preparers believed to be reasonable.

General Instructions

1. The Forms

You have received a copy of the four Forms - A, B, C and D - which make up the SOI questionnaire, as well as some brief SOI instructions on filling out the forms. This copy should be used as the master from which you can make any number of clean copies you need.

2. Questions Concerning the Forms

If you have any questions concerning these Instructions or the Forms, please direct them to the following persons in Morristown:

J. O. (Jim) Garrison	(201) 455-4294
E. J. (Ed) Shields	(201) 455-5630
H. J. (Harry) Wallum	(201) 455-3382
A. J. (Tony) Stewart	(201) 455-4033

These people will either be able to answer your questions, or, if they are not, they will contact the SOI staff for answers. In this way, the Company will be able to maintain consistency in answering the questions which the SOI staff has requested. For the same reason, the telephone number sought in the preamble for Form A for the person completing the Form will always be the telephone number of J. O. Garrison in Morristown so that the central office will know the questions the SOI staff is asking concerning the questionnaire.

3. A Good Faith, Good Judgement Effort

It is the Company's intent that we will make a good faith effort to answer the questions posed. This means that we will make a strong effort to answer the questions accurately and as completely as we can, given the short time span for responding.

Those filling out the forms should remember that a good faith effort includes the exercise of good judgement. While the SOI will expect us to be diligent in the pursuit of facts, it recognizes that time limitations will not permit us to leave no stone unturned to get the answers.

For example, in many, if not most cases, we will not have records covering waste disposal going back thirty years. This will require that we ask older employees what they recall concerning practices that go "way back". Good faith dictates that we should contact Company retirees who live in the community to see if they can be helpful. Good judgement, however, would suggest that it is not feasible to track down retirees all over the globe. We believe that the exercise of good judgement is also the exercise of good faith.

4. Additional Explanations

If you believe that the answer to any question requires a further explanation, please type the explanation on a separate sheet of paper, referencing the Form and Item Number and attach the explanation to the appropriate form.

5. Errata

Attached hereto is a list of errata on the Forms. Please take a moment to correct these errors before you fill out the Forms.

6. Submission to Division Coordinators

Drafts of all completed forms must be submitted to your Division Environmental Coordinators by June 8, 1979. They will then be reviewed by the Division, submitted for final collation by the Corporate Task Force assigned to this project, and then submitted to the SOI.

Detailed Instructions

Form A: General Facility Information

One Form A must be completed for your location.

Company Name:

Insert "Allied Chemical Corporation"
(Do not include the Division name)

Facility Name:

Insert the full name of your location
(e.g. "Baker & Adamson Works" not
"B & A Works")

Address:

Insert both street address and P.O. Box
number on line indicated.

Name and Position of Person Completing Form: Insert the name and
position of the Senior Plant, Regional,
or Division Pollution Control person
assigned the final responsibility for
assuring the survey forms are correctly
and completely executed.

Phone Number:

Insert (201) 455-4294. This is Jim Garrison's
Morristown office number. Jim will serve
as Allied Chemical's point of contact for
the subcommittee.

Item 1:

Insert the year Allied Chemical began
operating the facility after Allied
Chemical acquired it. Allied Chemical
Corporation was incorporated in 1920 as
"Allied Chemical and Dye Corporation".
Thus "1920" is the earliest date to be
inserted here.

Item 2:

Facilities with more than one primary
(4 digit) SIC Code - for example, if the
location has a sulfuric plant (SIC Code
2819) and a genetron plant (SIC Code 2869) -
should list the additional codes directly
under the one for which the box is provide
A partial listing of SIC Codes is attached
for reference.

Item 3:

- o Note that the total amount of process wastes disposed of in 1978 is to be inserted.
- o Do not include any wastes sent to a publicly owned treatment works, or covered under an NPDES permit (except for treatment plant sludges and wastes disposed of via deep wells, ocean dumping or land-farming).
- o Do include treatment plant sludges, and wastes which were disposed of in the ocean, by deep well, or by land-farming.
- o Do not include wastes which left the plant as emissions into the air.
- o Do include wastes and rubble from demolition operations conducted at your location.
- o Do not include office, laboratory, pilot plant, research facility, or warehouse wastes.
- o Do not include empty drums, empty bags, empty cardboard boxes, or other empty containers (whether or not they previously contained process chemicals or wastes).
- o All included wastes are to be reduced to tons if possible; otherwise to either gallons or cubic yards whichever is more convenient. The purpose of this is to permit estimation of a percentage for Item 4.
- o If the total 1978 wastes included add up to less than 0.5 of the unit of measurement used (i.e. less than 500 gallons or less than 50 tons or less than 500 cubic yards) insert "0"; if 0.5 to 1 of such unit (i.e. 500 to 1,000 cubic yards) insert 1. Similarly, all numbers are to be rounded off to the nearest unit. That is, if less than .5 insert the previous unit; if .5 or more, insert the next higher unit.

Item 4:

- o This item is to be completed for those wastes listed in units of hundred tons in Item 3. If you are unable to convert all wastes to tons, indicate on the back of Form A how the waste listed by 1,000 gallons (or 1,000 cubic yards) in Item 3 was disposed of.
- o If the percentage disposed of by a listed means is less than 0.5%, insert "0". Again, all numbers are to be rounded off to the nearest unit as in Item 3.
- o If a listed means of disposal was not used, simply insert a dash (-).
- o "Reprocessed/Recycled" means only material that we give away or pay to have hauled away, and which is believed to be recycled or recovered in whole or in part by another party (i.e. not Allied Chemical). It does not include any materials which we sell.
- o If more than one "other" means of disposal was used (e.g. land-farming, ocean dumping, etc.), all means of disposal should be set forth in the space provided, but only the combined percentage should be reported in the box provided.

Item 5:

Self explanatory.

Item 6:

The period covered by this question is since 1950. If Allied Chemical purchased your location or any part of your location since 1950, and also received the records of the seller or hired any former employees of the seller, then the effort should be made to cover the period from 1950 to present wherever called for in the forms.

Item 7:

Self explanatory.

Item 8:

Self explanatory. Important note - make sure that either the originals or photocopies of all source documents utilized are easily retrievable.

Item 9:

"Employees" means current long-service employees of the facility. Retired employees may be contacted if there is good reason to believe they may have pertinent knowledge not possessed by current employees. Important note - all interviews should be documented showing date, time, place, interviewer, interviewee, questions asked and answers provided. The purpose of the interview should be explained to each employee questioned.

Form B: Disposal Site Information

One Form B must be completed for each known site at which process wastes from your location were disposed of since 1950. If any such wastes were disposed of at your location, one Form B must be completed for your location. If any such wastes were disposed at another Allied Chemical facility, one Form B must be completed for such facility. Also one Form B must be completed for each known off-plant site at which such wastes were disposed of. Do not complete a Form B for wastes disposed of by discharge to a publicly owned treatment works.

Company Name: Insert "Allied Chemical Corporation" only.

Facility Name: Insert the full name of your location as reported on Form A.

Name of Site:

- o Insert the name of the disposal site.
- o For disposal sites located on the same property as your plant, list the name of your location (same entry as facility name above).

Address of Site: Insert the street address of the disposal site. Do not use Post Office Box number in lieu of street address, unless there is no street address known.

Name of Owner: Give street address if possible. However,
and Post Office Box number may be used if street
Current Owner: address is not known.

Item 1: Self explanatory.

Item 2: Insert the proper code number as follows:

Code 1 = Allied Chemical Ownership
Code 2 = Private ownership other than Allied Chemical
Code 3 = Public ownership (City, State, County, Municipality or an authority created by a Governmental body)
Code 9 = Don't know

Item 3:

- o Insert the proper code number as follows:

Code 1 = Closed

Code 2 = Still Open

Code 9 = Don't Know

- o For the date of site closure - if the disposal site is now closed, but the year of closure is unknown, insert your best estimate of the year closed and put "estimated" on the dotted line to the left of the box.

Item 4:

The answer should show the year the disposal site was first used by the facility under Allied Chemical ownership or control. If uncertain, insert your best estimate and put the word "estimated" on the dotted line to the left of the box.

Item 5:

If uncertain of date, insert best estimate and put the word "estimated" on the dotted line to the left of the box

Item 6:

- o This includes only wastes from your plant which were disposed of from 1950 to date at the particular site for which the Form 3 is being completed.
- o More than one type of unit may be used in completing this item. However, do not count the same waste twice (e.g. as 1,000 gallons and 100 tons).
- o If the wastes at your location from 1950 to date total less than 0.5 of the unit of measurement used (i.e. less than 500 gallons or less than 50 tons or less than 500 cubic yards) insert "0" in the boxes provided and indicate the actual amounts on the dotted line to the left of the appropriate box. If 0.5 to 1 of such unit (i.e. 500 to 1,000 cubic yards) insert 1. Similarly, all numbers are to be rounded off to the nearest unit. That is, if less than .5 insert the previous unit; if .5 or more, insert the next higher unit.
- o Do not include wastes which left the plant as emissions into the air.
- o Do include wastes and rubble from demolition operations conducted at your location.

- o Do not include office, laboratory, pilot plant, research facility, or warehouse wastes.
- o Do not include empty drums, empty bags, empty containers (whether or not they previously contained process chemicals or wastes).
- o If the Form B is being completed for Disposal at your own location, do not include any wastes sent to a publicly owned treatment works, or covered under an NPDES permit (except do include treatment plant sludges and wastes disposed of on site via deep wells, or land-farming).

Item 7:

- o This item refers to the means of disposal available at the site, not just the means of disposal used for the wastes from your location.
- o One of the following code numbers must be inserted in each of the blocks, (42) through (52):

Code 1 = Currently in Use
 Code 2 = No Longer in Use
 Code 3 = Never Used
 Code 9 = Don't Know

Item 8:

- o One of the following code numbers must be inserted in the box provided.
- Code 1 = Your location only.
 Code 2 = Your location and other Allied Chemical facilities only.
 Code 3 = Allied Chemical and other generators of waste.
 Code 9 = Don't know if generators of waste other than Allied Chemical used the site.
- o In the space provided list the names of other Allied Chemical locations using the site for disposal. Also list any other users, but only if known from your own records or from the recollections of your employees.
 - o If the disposal site covered by the Form 3 is a publicly owned site (a.g. a municipal landfill) it is not necessary to list all known users. However, the types of users should be listed, if known.

*Explanation for section on the other report in
 the form is concerned with the other report
 on the site.*

Company Name:

Facility Name:

Site Name:

Item 9:

Make sure that pages 1 and 2 of Form B are stapled together when submitted.

Insert "Allied Chemical Corporation" only.

Insert the name of your location as reported on page 1 of Form B and on Form A.

The name of the disposal site covered by this form (as reported on page 1 of Form 3).

- o Note that a code number must be inserted in every block, (10) through (58).
- o Code 1 = "present in waste". For purposes of this survey, Code 1 should be used where the component or waste type described is known to be in the waste disposed of at this site. The word "present" includes previous analytical detection of the constituent at any level in the waste, or which you are reasonably certain is in the wastes. Note: The wastes do not have to be tested or retested for purposes of completing this form.
- o Code 2 = "not present in waste". For purposes of this survey, Code 2 should be used when the component has been analyzed for and found to be non-detectable in the waste disposed of, or when you are reasonably certain the specific type of waste is clearly not involved.
- o Code 3 = "don't know" should be used in all cases where Code 1 or Code 2 cannot be used.
- o The indented components or characteristics in the list are sub-categories of the waste type they are listed under. Any descriptive characteristics of the main category apply to the indented items. For example, a neutralized (to pH 5-6) plating waste is not the waste type covered by block (12). However, a plating waste with a pH of 2 would be.
- o Halogenated aliphatics (Block 39) and halogenated aromatics (Block 40) are the same as solvents halogenated aliphatic (Block 51) and solvents halogenated aromatic (Block 52). Nevertheless, fill in all four blocks with the proper code number.

*Even 100% of material
is not 100% of material
on separate block (12)
even if you put your
name in it. This is
not correct for the
components.
Full name, codes contain
only the components
only the name.*

- o Block 20 - Heavy metals and trace metals - the parenthetical expression should read "bonded organically or inorganically" (or not and).

Form C: Hauler Information

Only one Form C is to be completed, and this only if process wastes were removed from your location since 1950.

Company Name:

Insert "Allied Chemical Corporation"

Facility Name:

Insert the name of your location, the same as reported on Forms A & B.

Names and Addresses

of Firms or Contractors:

Provide as complete information as possible. Give both street address and P.O. Box number if known.

Form D: Supplemental Hauler Information

One Form D must be completed for each hauler serving your location who hauled wastes to an unknown disposal site.

- Company Name: Insert "Allied Chemical Corporation".
- Facility Name: Insert the name of your location as reported on Forms A, B & C.
- Name of Hauling Firm/Contractor: The business or corporate name used by the hauler.
- Address (of Hauling Firm/Contractor): Provide as complete information as possible. Give both street address and P.O. Box if known.
- Item 1: The answer should show the year the waste hauler was first used by the facility under Allied Chemical ownership or control. If uncertain, insert your best estimate and put the word "estimated" on the dotted line to the left of the box.
- Item 2: If uncertain of date, the hauler was last used by your location, give best estimate and insert the word "estimated" on the dotted line to the left of the box.
- Item 3:
- o This includes only the wastes from your site which were hauled by a hauler from 1950 to date to a disposal site unknown to you.
 - o More than one type of unit may be used in completing this item. However, do not count the same waste twice (e.g. 1,000 gallons and 100 tons).
 - o Do include wastes and rubble from demolition operations conducted at your location.
 - o Do not include office, laboratory, pilot plant, research facility, or warehouse wastes.
 - o Do not include empty drums, empty bags, empty cardboard boxes- or other empty containers (whether or not they previously contained process chemicals or wastes).

- o If the wastes from 1950 to date total less than 0.5 of the unit of measurement used (i.e. less than 500 gallons or less than 50 tons or less than 500 cubic yards) insert "0" ; if 0.5 to 1 of such unit (i.e. 500 to 1,000 cubic yards) insert 1. Similarly, all numbers are to be rounded off to the nearest unit. That is, if less than .5 insert the previous unit; if .5 or more, insert the next higher unit.

Item 4:

- o Note that a code number must be inserted in every block, (37) through (79) and (10) through (25).
- o Code 1 = "present in waste". For purposes of this survey, Code 1 should be used where the component or waste type described is known to be in the waste removed from your location by this hauler. The word "present" includes previous analytical detection of the constituent at any level in the waste. Note: The wastes do not have to be tested or re-tested for purposes of answering this form.
- o Code 2 = "not present in waste". For purposes of this survey, Code 2 should be used only when the component has been analyzed for and found to be non-detectable in the waste disposed of, or when the specific type of waste is clearly not involved.
- o Code 3 = "don't know" should be used in all cases where Code 1 or Code 2 cannot be used with reasonable certainty.
- o The indented components or characteristics in the list are sub-categories of the waste type they are listed under. Any descriptive characteristics of the main category apply to the indented items. For example, a neutralized (to pH 5-6) plating waste is not the waste type covered by block (39). However, a plating waste with a pH of 2 would be.
- o Halogenated aliphatics (Block 66) and halogenated aromatics (Block 67) are the same as solvents halogenated aliphatic (Block 76) and solvents halogenated aromatic (Block 79). Nevertheless, fill in all four blocks with the proper code number.

- o Block 47 - Heavy metals and trace metals
the parenthetical expression should read
"bonded organically or inorganically"
(or not and).

ERRATA

- The following changes should be made on Form B, question 9 and Form D, question 4:
 1. "Base solutions, with pH 10" should read: "Base solutions, with pH 12";
 2. "Radioactive residues 3 pico curies/liter" should read: "Radioactive residues 50 pico curies/gram";
 3. Under organics, the first item "pesticides & intermediates" should read "insecticides & intermediates";
 4. Under organics, "solvents protic (except water)" should read "solvents polar (except water)"; and
 5. Under organics, "other solvents nonprotic" should read "other solvents nonpolar."

Point Source Categories

1. TIMBER PRODUCTS PROCESSING

- SIC 2411 - Logging Camps and Logging Contractors (Camps Only)
- SIC 2421 - Saw Mills and Planing Mills, General
- SIC 2426 - Hardwood Dimension and Flooring Mills
- SIC 2429 - Special Purpose Sawmills, Not Elsewhere Classified
- SIC 2431 - Millwork
- SIC 2434 - Wood Kitchen Cabinets
- SIC 2435 - Hardwood Veneer and Plywood
- SIC 2436 - Softwood Veneer and Plywood
- SIC 2439 - Structural Wood Members, Not Elsewhere Classified
- SIC 2491 - Wood Preserving
- SIC 2499 - Wood Products, Not Elsewhere Classified (Furniture Mills)
- SIC 2661 - Building Paper and Building Board Mills (Hardboard Only)

2. STEAM ELECTRIC POWER PLANTS

- SIC 4911 - Electric Services (Limited to Steam-Electric Power Plants)

3. LEATHER TANNING AND FINISHING

- SIC 31 - Leather and Leather Products

4. IRON AND STEEL MANUFACTURING

- SIC 3312 - Blast Furnaces (Including Coke Ovens), Steel Works and Rolling Mills.
- SIC 3313 - Electrometallurgical Products.
- SIC 3315 - Steel Wire Drawing and Steel Nails and Spikes.
- SIC 3316 - Cold Rolled Steel Sheet, Strip and Bars.
- SIC 3317 - Steel Pipe and Tubes.

5. PETROLEUM REFINING

- SIC 2911 - Petroleum Refining (Including 1) Topping Plants; 2) Topping and Cracking Plants; 3) Topping, Cracking and Petrochemical Plants; 4) Integrated Plants; and, 5) Integrated and Petro-chemical Plants)

6. INORGANIC CHEMICALS MANUFACTURING

- SIC 2812 - Alkalies and Chlorine
- SIC 2813 - Industrial Gases
- SIC 2816 - Inorganic Pigments
- SIC 2819 - Industrial Inorganic Chemicals, Not Elsewhere Classified

7. TEXTILE MILLS

- SIC 22 - Textile Mill Products
- SIC 23 - Apparel and Other Finished Products Made from Fabrics and Similar Materials

8. ORGANIC CHEMICALS MANUFACTURING

- SIC 2865 - Cyclic (Coal Tar) Crudes, and Cyclic Intermediates, Dyes, and Organic Pigments (Lakes and Toners)

9. NONFERROUS METALS MANUFACTURING

- SIC 3319 - Industrial Inorganic Chemicals, Not Elsewhere Classified (Bauxite Refining Only)
- SIC 3331 - Primary Smelting and Refining of Copper
- SIC 3332 - Primary Smelting and Refining of Lead
- SIC 3333 - Primary Smelting and Refining of Zinc

- SIC 3334 - Primary Production of Aluminum

- SIC 3339 - Primary Smelting and Refining of Nonferrous Metals, Not Elsewhere Classified

- SIC 3341 - Secondary Smelting and Refining of Nonferrous Metals

10. PAVING AND ROOFING MATERIALS (TARS AND ASPHALT)

- SIC 2951 - Paving Mixtures and Blocks
- SIC 2952 - Asphalt Felts and Coatings
- SIC 3996 - Linoleum, Asphalted-Felt-Base, and Other Hard Surface Floor Coverings, Not Elsewhere Classified

11. PAINT AND INK FORMULATION AND PRINTING

- SIC 2711 - Newspapers: Publishing, Publishing and Printing
- SIC 2721 - Periodicals: Publishing, Publishing and Printing
- SIC 2731 - Books: Publishing, Publishing and Printing
- SIC 2732 - Book Printing
- SIC 2741 - Miscellaneous Publishing
- SIC 2751 - Commercial Printing, Letterpress and Screen
- SIC 2752 - Commercial Printing, Letterpress and Lithographic
- SIC 2753 - Engraving and Plate Printing
- SIC 2754 - Commercial Printing, Gravure
- SIC 2761 - Mainfold Business Forms
- SIC 2771 - Greeting Card Publishing
- SIC 2793 - Photoengraving
- SIC 2794 - Electrotyping and Stereotyping
- SIC 2795 - Lithographic Platemaking and Related Services
- SIC 2831 - Paints, Varnishes, Lacquers, Enamels, and Allied Products
- SIC 2893 - Printing Ink
- SIC 3951 - Pens, Mechanical pencils, and Parts and Stamp Pads (Inked Materials Only)
- SIC 3952 - Lead Pencils, Crayons, and Artists' Materials
- SIC 3953 - Carbon Paper and Inked Ribbons

12. SOAP AND DETERGENT MANUFACTURING

- SIC 2841 - Soap and Other Detergents, except Specialty Cleaners

13. AUTO AND OTHER LAUNDRIES

- SIC 7211 - Power Laundries, Family and Commercial
- SIC 7213 - Linen Supply
- SIC 7214 - Diaper Service
- SIC 7215 - Coin-operated Laundries and Dry Cleaning
- SIC 7216 - Dry Cleaning Plants, Except Rug Cleaning
- SIC 7217 - Carpet and Upholstery Cleaning
- SIC 7218 - Industrial Laundries
- SIC 7219 - Laundry and Garment Services, Not Elsewhere Classified
- None - Auto Wash Establishments

14. PLASTIC AND SYNTHETIC MATERIALS MANUFACTURING

- SIC 282 - Plastic Materials and Synthetic Resins, Synthetic and Other Manmade Fibers, except Glass

15. PULP AND PAPERBOARD MILLS AND CONVERTED PAPER PRODUCTS

- SIC 2611 - Pulp Mills
- SIC 2621 - Paper Mills, except Building Paper Mills
- SIC 2631 - Paperboard Mills
- SIC 2641 - Paper Coating and Glazing
- SIC 2642 - Envelopes
- SIC 2643 - Bags, Except Textile Bags
- SIC 2645 - Die-Cut Paper and Paperboard and Cardboard
- SIC 2646 - Pressed and Molded Pulp Goods
- SIC 2647 - Sanitary Paper Products
- SIC 2648 - Stationery, Tablets, and Related Products
- SIC 2649 - Converted Paper and Paperboard Products, Not Elsewhere Classified
- SIC 2651 - Folding Paperboard Boxes
- SIC 2652 - Set-up Paperboard Boxes
- SIC 2653 - Corrugated and Solid Fiber Boxes
- SIC 2654 - Sanitary Food Containers
- SIC 2655 - Fiber Cans, Tubes, Drums, and Similar Products
- SIC 2661 - Building Paper and Building Board Mills
- SIC 2732 - Blankbooks, Looseleaf Binders and Devices

16. RUBBER PROCESSING

- SIC 2822 - Synthetic Rubber (Vulcanizable Elastomers)
- SIC 2891 - Rubber Cement
- SIC 3011 - Tires and Inner Tubes

- SIC 3021 - Rubber and Plastics Footwear (Rubber Only)

- SIC 3031 - Reclaimed Rubber

- SIC 3041 - Rubber and Plastics Hose and Belting (Rubber Only)

- SIC 3069 - Fabricated Rubber Products, Not Elsewhere Classified

- SIC 3293 - Gaskets, Packing, and Sealing Devices (Rubber Packing Only)

17. MISCELLANEOUS CHEMICALS

- SIC 2831 - Biological Products

- SIC 2833 - Medicinal Chemicals and Botanical Products

- SIC 2834 - Pharmaceutical Preparations

- SIC 2861 - Gum and Wood Chemicals

- SIC 2879 - Pesticides and Agricultural Chemicals, Not Elsewhere Classified

- SIC 2891 - Adhesive and Sealants

- SIC 2892 - Explosives

- SIC 2895 - Carbon Black

- SIC 2899 - Chemicals and Chemical Preparation, Not Elsewhere Classified

- SIC 3361 - Photographic Equipment and Supplies

18. MACHINERY AND MECHANICAL PRODUCTS MANUFACTURING

- SIC 3021 - Rubber and Plastics Footwear (Balance)

- SIC 3041 - Rubber and Plastics Hose and Belting (Balance)

- SIC 3079 - Miscellaneous Plastics Products

- SIC 3293 - Gaskets, Packing, and Sealing Devices (Balance)

- SIC 3321 - Gray Iron Foundries

- SIC 3322 - Malleable Iron Foundries

- SIC 3324 - Steel Investment Foundries

- SIC 3325 - Steel Foundries, Not Elsewhere Classified

- SIC 3351 - Rolling, Drawing, and Extruding of Copper

- SIC 3353 - Aluminum Sheet, Plate, and Foil

- SIC 3354 - Aluminum Extruded Products

- SIC 3355 - Aluminum Rolling and Drawing, Not Elsewhere Classified

- SIC 3356 - Rolling, Drawing, and Extruding of Nonferrous Metals, except copper and aluminum

SIC 3357 - Drawing and Insulating
 of Nonferrous Wire
 SIC 3361 - Aluminum Foundries
 (Castings)
 SIC 3362 - Brass, Bronze, Copper,
 Copper Base Alloy Foundries
 (Castings)
 SIC 3369 - Nonferrous Foundries
 (Castings), Not Elsewhere Classi-
 fied
 SIC 3398 - Metal Heat Treating
 SIC 3399 - Primary Metal Products,
 Not Elsewhere Classified
 SIC 3411 - Metal Cans
 SIC 3412 - Metal Shipping Barrels,
 Drums, Kegs, and Pails
 SIC 3421 - Cutlery
 SIC 3423 - Hand and Edge Tools,
 Except Machine Tools and Hand
 Saws
 SIC 3425 - Hand Saws and Saw
 Blades
 SIC 3429 - Hardware, Not Elsewhere
 Classified
 SIC 3431 - Enameled Iron and Metal
 Sanitary Ware
 SIC 3432 - Plumbing Fixture Fittings
 and Trim (Brass Goods)
 SIC 3433 - Heating Equipment,
 Except Electric and Warm Air
 Furnaces
 SIC 3441 - Fabricated Structural
 Metal
 SIC 3442 - Metal Doors, Sash,
 Frames, Molding, and Trim
 SIC 3443 - Fabricated Platework
 (Boiler Shops)
 SIC 3444 - Sheet Metal Work
 SIC 3446 - Architectural and Orna-
 mental Metal Work
 SIC 3448 - Prefabricated Metal
 Buildings and Components
 SIC 3449 - Miscellaneous Metal
 Work
 SIC 3451 - Screw Machine Products
 SIC 3452 - Bolts, Nuts, Screws, Riv-
 ets, and Washers
 SIC 3462 - Iron and Steel Forgings
 SIC 3463 - Nonferrous Forgings
 SIC 3465 - Automotive Stampings
 SIC 3466 - Crowns and Closures
 SIC 3469 - Metal Stampings, Not
 Elsewhere Classified
 SIC 3482 - Small Arms Ammunition
 SIC 3483 - Ammunition, Except for
 Small Arms, Not Elsewhere Clas-
 sified
 SIC 3484 - Small Arms

SIC 3489 - Ordnance and Accesso-
 ries, Not Elsewhere Classified
 SIC 3493 - Steel Springs, Except
 Wire
 SIC 3494 - Valves and Pipe Fittings,
 Except Plumbers' Brass Goods
 SIC 3495 - Wire Springs
 SIC 3496 - Miscellaneous Fabricated
 Wire Products
 SIC 3497 - Metal Foil and Leaf
 SIC 3498 - Fabricated Pipe and
 Fabricated Pipe Fittings
 SIC 3499 - Fabricated Metal Prod-
 ucts, Not Elsewhere Classified
 SIC 3511 - Steam, Gas, and Hydrau-
 lic Turbines and Turbine Genera-
 tor Set Units
 SIC 3519 - Internal Combustion
 Engines, Not Elsewhere Classified
 SIC 3523 - Farm Machinery and
 Equipment
 SIC 3524 - Garden Tractors and
 Lawn and Garden Equipment
 SIC 3531 - Construction Machinery
 and Equipment
 SIC 3532 - Mining Machinery and
 Equipment, Except Oil Field
 Machinery and Equipment
 SIC 3533 - Oil Field Machinery and
 Equipment
 SIC 3534 - Elevators and Moving
 Stairways
 SIC 3535 - Conveyors and Convey-
 ing Equipment
 SIC 3536 - Hoists, Industrial Cranes,
 and Monorail Systems
 SIC 3537 - Industrial Trucks, Trac-
 tors, Trailers, and Stackers
 SIC 3541 - Machine Tools, Metal
 Cutting Types
 SIC 3542 - Machine Tools, Metal
 Forming Types
 SIC 3544 - Special Dies and Tools,
 Die Sets, Jigs and Fixtures and
 Industrial Molds
 SIC 3545 - Machine Tool Accessories
 and Measuring Devices
 SIC 3546 - Power Driven Hand
 Tools
 SIC 3547 - Rolling Mill Machinery
 and Equipment
 SIC 3549 - Metalworking Machinery,
 Not Elsewhere Classified
 SIC 3551 - Food Products Machinery
 SIC 3552 - Textile Machinery
 SIC 3553 - Woodworking Machinery
 SIC 3554 - Paper Industries Machin-
 ery

- SIC 3533 - Printing Trades Machinery and Equipment
- SIC 3539 - Special Industry Machinery, Not Elsewhere Classified
- SIC 3561 - Pumps and Pumping Equipment
- SIC 3562 - Ball and Roller Bearings
- SIC 3563 - Air and Gas Compressors
- SIC 3564 - Blowers and Exhaust and Ventilation Fans
- SIC 3565 - Industrial Patterns
- SIC 3566 - Speed Changers, Industrial High Speed Drives, and Gears
- SIC 3567 - Industrial Process Furnaces and Ovens
- SIC 3568 - Mechanical Power Transmission Equipment, Not Elsewhere Classified
- SIC 3569 - General Industrial Machinery and Equipment, Not Elsewhere Classified
- SIC 3572 - Typewriters
- SIC 3573 - Electronic Computing Equipment
- SIC 3574 - Calculating and Accounting Machines, Except Electronic Computing Equipment
- SIC 3576 - Scales and Balances, Except Laboratory
- SIC 3579 - Office Machines, Not Elsewhere Classified
- SIC 3581 - Automatic Merchandising Machines
- SIC 3582 - Commercial Laundry, Dry Cleaning, and Pressing Machines
- SIC 3585 - Air Conditioning and Warm Air Heating Equipment and Commercial and Industrial Refrigeration Equipment
- SIC 3586 - Measuring and Dispensing Pumps
- SIC 3589 - Service Industry Machines, Not Elsewhere Classified
- SIC 3592 - Carburetors, Piston, Piston Rings, and Valves
- SIC 3599 - Machinery, Except Electrical, Not Elsewhere Classified
- SIC 3612 - Power, Distribution, and Specialty Transformers
- SIC 3613 - Switchgear and Switchboard Apparatus
- SIC 3621 - Motors and Generators
- SIC 3622 - Industrial Controls
- SIC 3623 - Welding Apparatus, Electric
- SIC 3624 - Carbon and Graphite Products
- SIC 3629 - Electrical Industrial Apparatus, Not Elsewhere Classified
- SIC 3631 - Household Cooking Equipment
- SIC 3632 - Household Refrigerators and Home and Farm Freezers
- SIC 3633 - Household Laundry Equipment
- SIC 3634 - Electric Housewares and Fans
- SIC 3635 - Household Vacuum Cleaners
- SIC 3639 - Household Appliances, Not Elsewhere Classified
- SIC 3641 - Electric Lamps
- SIC 3643 - Current-Carrying Wiring Devices
- SIC 3644 - Noncurrent-Carrying Wiring Devices
- SIC 3645 - Residential Electric Lighting Fixtures
- SIC 3646 - Commercial, Industrial, and Institutional Electric Lighting Fixtures
- SIC 3647 - Vehicular Lighting Equipment
- SIC 3648 - Lighting Equipment, Not Elsewhere Classified
- SIC 3651 - Radio and Television Receiving Sets, Except Communication Types
- SIC 3652 - Phonograph Records and Pre-recorded Magnetic Tape
- SIC 3661 - Telephone and Telegraph Apparatus
- SIC 3662 - Radio and Television Transmitting, Signaling, and Detection Equipment and Apparatus
- SIC 3671 - Radio and Television Receiving Type Electron Tubes, Except Cathode Ray
- SIC 3672 - Cathode Ray Television Picture Tubes
- SIC 3673 - Transmitting, Industrial, and Special Purpose Electron Tubes
- SIC 3674 - Semiconductors and Related Devices
- SIC 3675 - Electronic Capacitors
- SIC 3676 - Resistors, for Electronic Applications
- SIC 3677 - Electronic Coils, Transformers and Other Inductors
- SIC 3678 - Connectors, for Electronic Applications
- SIC 3679 - Electronic Components, Not Elsewhere Classified

SIC 3691 - Storage Batteries
 SIC 3692 - Primary Batteries, Dry and Wet
 SIC 3693 - Radiographic X-ray, Fluoroscopic X-ray, Therapeutic X-ray and Other X-ray Apparatus and Tubes; Electromedical and Electrotherapeutic Apparatus
 SIC 3694 - Electrical Equipment for Internal Combustion Engines
 SIC 3699 - Electrical Machinery, Equipment, and Supplies, Not Elsewhere Classified
 SIC 3711 - Motor Vehicles and Passenger Car Bodies
 SIC 3713 - Truck and Bus Bodies
 SIC 3714 - Motor Vehicle Parts and Accessories
 SIC 3715 - Truck Trailers
 SIC 3721 - Aircraft
 SIC 3724 - Aircraft Engines and Engine Parts
 SIC 3729 - Aircraft Parts and Auxiliary Equipment, Not Elsewhere Classified
 SIC 3731 - Ship Building and Repairing
 SIC 3732 - Boat Building and Repairing
 SIC 3743 - Railroad Equipment
 SIC 3751 - Motorcycles, Bicycles, and Parts
 SIC 3761 - Guided Missiles and Space Vehicles
 SIC 3764 - Guided Missile and Space Vehicle Propulsion Units and Propulsion Unit Parts
 SIC 3769 - Guided Missile and Space Vehicle Parts and Auxiliary Equipment, Not Elsewhere Classified
 SIC 3792 - Travel Trailers and Campers
 SIC 3793 - Tanks and Tank Components
 SIC 3799 - Transportation Equipment, Not Elsewhere Classified
 SIC 3811 - Engineering, Laboratory, Scientific, and Research Instruments and Associated Equipment
 SIC 3822 - Automatic Controls for Regulating Residential and Commercial Environments and Appliances
 SIC 3823 - Industrial Instruments for Measurement, Display and Control of Process Variables; and Related Products

SIC 3824 - Totalizing Fluid Meters and Counting Devices
 SIC 3825 - Instruments for Measuring and Testing of Electricity and Electrical Signals
 SIC 3829 - Measuring and Controlling Devices, Not Elsewhere Classified
 SIC 3832 - Optical Instruments and Lenses
 SIC 3841 - Surgical and Medical Instruments and Apparatus
 SIC 3842 - Orthopedic, Prosthetic, and Surgical Appliances and Supplies
 SIC 3843 - Dental Equipment and Supplies
 SIC 3851 - Ophthalmic Goods
 SIC 3873 - Watches, Clocks, Clockwork Operated Devices and Parts
 SIC 3911 - Jewelry, Precious Metal
 SIC 3914 - Silverware, Plated Ware, and Stainless Steel Ware
 SIC 3915 - Jewelers' Findings and Materials, and Lapidary Work
 SIC 3931 - Musical Instruments
 SIC 3942 - Dolls
 SIC 3944 - Games, Toys, and Children's Vehicles; Except Dolls and Bicycles
 SIC 3949 - Sporting and Athletic Goods, Not Elsewhere Classified
 SIC 3951 - Pens, Mechanical Pencils, and Parts (Balance)
 SIC 3961 - Costume Jewelry and Costume Novelties, Except Precious Metal
 SIC 3991 - Brooms and Brushes
 SIC 3993 - Signs and Advertising Displays
 SIC 3995 - Burial Caskets
 19. ELECTROPLATING
 SIC 347 - Coating, Engraving, and Allied Services
 20. ORE MINING AND DRESSING
 SIC 1011 - Iron Ores
 SIC 1021 - Copper Ores
 SIC 1031 - Lead and Zinc Ores
 SIC 1041 - Gold Ores
 SIC 1044 - Silver Ores
 SIC 1051 - Bauxite and Other Aluminum Ores
 SIC 1061 - Ferroalloy Ores, Except Vanadium
 SIC 1092 - Mercury Ores
 SIC 1094 - Uranium-Radium-Vanadium Ores
 SIC 1099 - Metal Ores, Not Elsewhere Classified

21. COAL MINING

SIC 1111 - Anthracite
 SIC 1112 - Anthracite Mining Services
 SIC 1211 - Bituminous Coal and Lignite
 SIC 1213 - Bituminous Coal and Lignite Mining Services

CITY OF TOLEDO OHIO

10/1/73

POLLUTION CONTROL AGENCY



JAMES B. DAKEN
CITY MANAGER

PAUL D. FINDLAY
DIRECTOR OF POLLUTION CONTROL

OFFICES: 28 MAIN STREET
ZIP CODE 43605
TELEPHONE: (419) 255-1500
EXT. 445

September 26, 1973

9/27/73
Mr. S. F. Harantha, Plant Manager
Allied Chemical Corporation
Plastics Division
2829 Glendale Avenue
Toledo, Ohio 43614

Dear Mr. Harantha:

I am in receipt of your letter of September 18th as it would have to do with solid waste disposal sites in the Toledo area. I would like to make reference to your remarks relative to the Dura Landfill. You indicated the following:

"Closed to all commercial and industrial haulers. Site should have been completely closed several months ago and will be closed in about three months to residential refuse."

In checking this last week with Mr. Van Cott, Acting Commissioner, Division of Solid Wastes, I noted that in 1968 an ordinance was passed which outlawed commercial and industrial haulers to use the Dura Landfill. According to Mr. Van Cott, however, it is not true that this landfill (Dura) will be closed in about three months to residential refuse. The City has secured an additional 13 acres adjacent to Dura and it is projected by Mr. Van Cott that residential refuse could go into the Dura Landfill for approximately 22 months.

As you are aware, there is an Environmental Studies Committee Report, dated April 3, 1973, to the Board of Trustees of the Toledo Area Chamber of Commerce on industrial solid waste which is contained in a Summary Report of the Survey dated April 4, 1973. This office does not have a complete report on the Survey but I have with this cover letter sent several of the Summary Reports of the Survey, one to Mr. Eugene R. Kasper, Director of the Department of Public Service and to Mr. Van Cott, who works as Acting Commissioner under Mr. Kasper.

As you know the City Manager has a Solid Waste Task Force under the direction of Mr. Richard Boers, Commissioner, Division of Forestry, and at many of these meetings I have indicated that if we are going to consider as a responsibility the proper method of disposal, for instance, in landfills of industrial solid waste which, of course, would include as far as I am concerned liquids, slurries, sludges. It is necessary to know the quality and quantity of the many different types of industrial waste produced by local

SEP 27 1973

Mr. S. F. Harantha

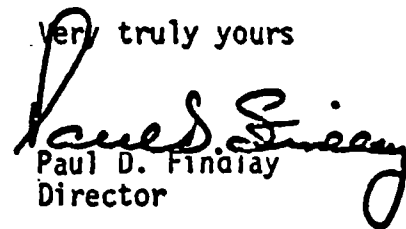
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September 26, 1973

industry. At the meetings of the Solid Waste Task Force which I have attended the sophistication of some of this industrial waste has not been made known to the members of the Task Force. Although Mr. Lieder of Sun Oil, Chairman of the Industrial Solid Waste Subcommittee of the Environmental Studies Committee of the Chamber is on the Task Force, he is also a member of the City Manager's Task Force on Solid Waste.

I am sending a copy of your letter to Mr. Kasper and Mr. Van Cott for their information, and as indicated, also sending them a Summary of the Report of the Survey of the Toledo Area Chamber of Commerce.

Very truly yours


Paul D. Findlay
Director

PDF:r

att.

cc: Floyd Shepherd, TACC (Toledo Area Chamber of Commerce)
Richard Boers, Comm'r, Div. of Forestry
W. R. Van Cott, Act'g Comm'r, Div. of Solid Wastes
Eugene R. Kasper, Director, Dept. of Public Service

Public, Industry Waste Disposal Pool Suggested

Chamber Urges Combined Effort To Solve Problems

Industry and government should quickly form a partnership to find methods of disposing of a steadily rising mountain of solid waste, according to a special study committee of the Toledo Area Chamber of Commerce.

The report by the environmental studies committee found that industries here dispose of an estimated 54,000 tons of solid waste a year. This compares with 120,000 tons of household trash collected annually by the city of Toledo.

The report will be forwarded to the Toledo solid waste task force, appointed by City Manager Deken last year to look for new disposal sites; the Toledo Metropolitan Area Council of Governments, and the Ohio Environmental Protection Agency, all of which are studying disposal needs.

The chamber's board of trustees has adopted a study committee's recommendation that the chamber coordinate industry's part in disposal planning.

The survey involved completion of questionnaires by local industries which employ more than half of Toledo's manufacturing work force.

Most industries now dispose of their waste at private landfills or on the plant site. State regulations do not cover waste disposal on private property, as long as there is no pollution of air or water outside plant boundaries.

Space Decreasing

The report team warned that the available landfill space is steadily decreasing, as the volume of solid wastes increases.

"Expansion, in the form of new disposal sites, is just around the corner," the report said.

Two governmental sites have been identified in the Toledo area.

landfill has a projected life of two years and the county's King Road landfill is to be closed in June. The only other public landfill in northwestern Ohio, exclusive of the Rossford municipal landfill, will then be the Wood County landfill, six miles west of Bowling Green.

Industries have a problem because not all types of industrial wastes are suitable for municipal or private landfills, the report said. Most industries surveyed said that if disposal costs rise because of the lack of disposal facilities in the area, then consumer price rises will follow.

New Methods Needed

Recycling of waste is done by some industries, but only where it is economically feasible. Further recycling will require new methods or markets for the recycled materials, the report said.

There are possibilities for using some wastes in new processes, particularly liquid wastes, which are disposed of at an annual volume of 17 million gallons in the Toledo area, the survey estimated.

Most of the liquid wastes are oil-based and are disposed of by high-intensity incineration, which leaves no residue or smoke. The report noted that there is a reasonably large volume of high heating value in liquid waste incinerated, and there are some studies being made to determine how to combine some types of liquid wastes as possible energy sources.

The report suggested that construction of a large liquid-waste incinerator be undertaken on a regional basis, since studies have shown that the larger an incinerator, the more efficient it is.

Opportunities exist in proper waste management to use one type of waste to dispose of another, the report said. For example, the waste metal-pickling discharge of Detroit Industry has been used to remove phosphates in municipal sewage.

W. Donald Lieder, an engineer with Sun Oil Co., was chairman of the special study team. Other members were Dr. Gary P. Bennett, University of Toledo; John S. Ekroymsen, Sinclair Manufacturing Co., and Richard J. MacAdams, of Sunborn, Steelcase, Ows & Evans, Inc., an engineering firm.

The Blade
April 28, 1973

TOLEDO AREA CHAMBER OF COMMERCE
112 N. HARRIS STREET - TOLEDO, OHIO 43601

The Toledo Times
May 1, 1973

Chamber Offers To Aid Waste Disposal Problem

The Toledo Area Chamber of Commerce has offered its services as an agency to coordinate industry's role in solving the problem of waste disposal.

Assistance was proposed in a study by an environmental committee and approved by the organization's board of trustees.

Industrial waste disposal is an expensive and growing problem in the Toledo area and solutions to it should be considered at the same time that general public disposal facilities are being planned, the study pointed out.

Recommendations have been forwarded to the City of Toledo's solid waste task force, the Toledo Metropolitan Area Council of Governments, and the Ohio Environmental Protection Agency. These agencies are studying the disposal needs of the metropolitan area.

The study estimated that industrial wastes in the Toledo area amount to 54,000 tons annually. This compares to 120,000 tons of household trash collected each year in Toledo and shows the magnitude of the industry's waste disposal problem. Industries also generate an estimated 17 million gallons annually of liquids and sludges that are unacceptable for disposal through the sanitary sewer system.

Planning action is required, the study concluded, because the disposal needs of government and industry have become critical at the same time it makes sense to develop a combined solution, the committee recommended.

W. Donald Lieder of the Sun Oil Co. was chairman of the study committee.

* * *

DATE: April 3, 1973
MEMO TO: Chamber Board of Trustees
FROM: Environmental Studies Committee



RECOMMENDATION: The Environmental Studies Committee requests authorization of the Chamber Board of Trustees to act in the role of providing industrial input to any Toledo area potential government solution of waste disposal, whether on a municipal basis or any other basis.

Background

Presently the City of Toledo has a task force evaluating various methods for disposal for their municipal (household) solid wastes. Also TMACOG (Toledo Metropolitan Area Council of Governments) is seeking funds to conduct an extensive regional solid waste study of three Ohio counties (Lucas, Wood and Ottawa) and two neighboring Michigan townships.

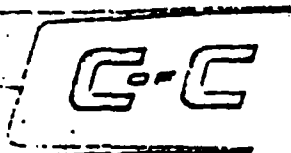
The Toledo Area Chamber of Commerce conducted a survey to examine the waste disposal problems being encountered by Toledo industries as industrial input to the government planning processes. Both solid and liquid waste unacceptable in the sanitary sewers were included. The survey placed special emphasis in listing unusual industrial wastes, wastes requiring special disposal, and estimates on general disposal volume.

Replies were received from area industries in response to a questionnaire sent out under the auspices of the Toledo Area Chamber of Commerce, inquiring about solid and liquid waste problems. Comments on present and anticipated disposal problems were particularly encouraged. The firms responding employ over one-half of the total working force in manufacturing plants in Toledo.

The replies were tabulated, evaluated, and the result is the summary report attached.

Basic Facts Supporting Recommendation

1. The magnitude of the problem is such that an industrial input must be considered in any potential government solution of waste disposal whether on a municipal basis or a complete multi-county, regional basis. Since industry is part of the community, it is logical that efforts in these areas include serious consideration of industry's problems and that solutions be sought in partnership with industry.
2. A concerted effort should be mounted by industry to cooperate with government bodies who are attempting to define and solve the community waste disposal problem.
3. The Toledo Area Chamber of Commerce would be an appropriate vehicle to coordinate industry's part in such an effort.



TOLEDO AREA CHAMBER OF COMMERCE

218 HURON STREET, TOLEDO, OHIO 43604 • PHONE (419) 243-8191

TOLEDO AREA
INDUSTRIAL SOLID WASTE
SUMMARY REPORT OF SURVEY
TOLEDO AREA CHAMBER OF COMMERCE

APRIL 4, 1973

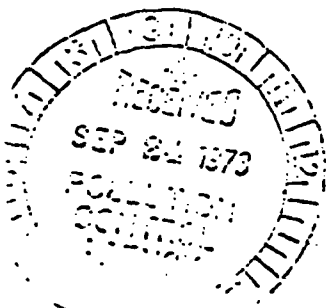
By: Solid Waste Subcommittee of the
Environmental Studies Committee

Chairman: W. Donald Lieder, P.E.
Sun Oil Company

Members: Dr. Gary F. Bennett
University of Toledo

John S. Efroymsen
Sinclair Manufacturing Company

Richard J. MacAdams, P.E.
Samborn, Steketee, Otis
& Evans, Inc.



INTRODUCTION

Presently the City of Toledo has a task force evaluating various methods for disposal for their municipal (household) solid wastes. Also TMACOG is seeking funds to conduct an extensive regional solid waste study of three Ohio counties (Lucas, Wood and Ottawa) and two neighboring Michigan townships.

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The replies were tabulated, evaluated, and the result is this summary report of the SOLID WASTE SURVEY conducted under the sponsorship of the Toledo Area Chamber of Commerce.

CONCLUSIONS FROM SURVEY

Analysis of the data from those firms which replied indicates a comprehensive representation of the total Toledo industrial community. From this information it is possible to project the total industrial output of such solid waste material. The following conclusions have been drawn from the data.

1. Total industrial wastes in the Toledo area are estimated as:

Solids*.....94,000 tons annually ✓

Liquids, Slurries, Sludges 17,000,000 gallons annually ✓✓

*NOTE: The solids total compares to 120,000 tons of household trash collected annually in the City of Toledo.

Although this diversity challenges disposal techniques, it does represent some opportunities for waste management, i. e., the acid waste of one industry could be used to neutralize the caustic of another. (For example, the waste metal pickling liquor of Detroit industry has been used to separate phosphates in municipal sewage.)

Finally, it is noted that there is a reasonably large volume of high heating value liquid waste which could be handled by incineration. This subject has already been the topic of a report prepared by Samborn, Steketee, Otis and Evans for Fondessy Enterprises. The mixing of wastes of various heating values to obtain a combustible mixture has also been studied by COPE Enterprises of Houston, Texas.

While the solid-waste problem of industry grows at an ever-increasing rate, and the community relies on landfill for disposal, the available landfill area shrinks. The two governmental sites have limited life. Dura (City of Toledo) has a projected span of two years due to recent property purchases, while King Road (Lucas County) has a six-month extension (from January 1, 1973) due to the addition of another layer. This is a remarkably short expected life for solid waste disposal which, however, should be of more concern to local government than industry. Industrial waste with its heterogenous nature, is not accepted by the city, nor openly welcomed by the county. If industry is looking for a stable long-range environment for operating, the solid waste problem area is not one in which they should feel secure; disaster, in the form of no disposal site, is just around the corner.

Difficulty in disposing of solid waste materials was an almost universal problem among the companies surveyed. The nature of the problem is not lost upon the management of the responding firms, and there does seem to be a desire for reasonable solutions. The cost factor obviously plays a major part in this solid waste problem and these costs will be reflected in plant operation and ultimately product costs. Specifically, the availability of landfill sites and transportation to those sites were classified as the major problems by industry.

Paper and paper products were suggested as the primary reusable material. The second item mentioned was glass and then various metallic scrap including cans and drums. Industry does recycle material where there is any economic feasibility in doing so, as a basic part of profit maintenance and cost cutting. Therefore, further recycling would require new methods or markets for the recycled materials.

Incineration of specific high heating value liquids is a possible solution. It is a fact that the larger the incinerator, the greater its effectiveness and the smaller the problems of its secondary effluents. The construction of such a facility might best be approached on a multi-company or regional authority basis.

A partial breakdown of both the solid and liquid waste materials is shown on Tables 1 and 2.

TABLE 1

SOLIDS

Total annual volume.....94,000 tons

Composition: Glass and other inorganics40%
 General - not defined.....38%
 Paper, Cardboard.....10%
 Plastic, Rubber, Textile.....7%
 Metal.....4%
 Construction - Rubble*, Wood.....1%

Total 100%

*NOTE: The low percentage of demolition rubble shown here indicates the exclusion of the construction industry from this survey, rather than its lack of importance as a solid waste problem.

TABLE 2

LIQUIDS, SLUDGES, SLURRIES

Total annual volume.....17,000,000 gallons

Composition: Oil Based

 Sludges and Slurries.....83%
 Liquids.....2%

 Water Based

 Sludges and Slurries.....6%
 Liquids......9%

Total 100%

*NOTE: Definition of Solid Waste for this report:

For the purpose of this report solid wastes are considered to include not only solid materials but also those liquid wastes which are not acceptable for the sanitary sewer system.

typical 60's

TOLEDO OPERATIONS
COMBUSTIBLE SCRAP

6-17-63

ESTIMATED
POUNDS/WEEK

1. AD BLDG. LOAD LUGGER	1,000
2. COATING RESIN	
a) Kettle #1, Bag P.A.	715
b) Plasticizer Press Papers (finished prod. only)	105
c) Locker & Office scrap, catons & misc.	750
3. GRANULAR AWC - 2 SHIFTS	
a) Asbestos, Clay, Floc, Zinc, Barium, Glass bags	1,200
b) Polyester cartons	200
4. REINFORCED AWC - 3 SHIFTS	
a) Clay, Barium Antimony bags	170
b) Glass cartons	285
c) Unit load corrugated paper covering	360
d) Disposable pallets	810
5. MOLDING COMPOUND - BASED ON BULK UREA & MELAMINE	
a) Paper crates - pulp room, drum wash	1,600
b) Bags: Hexa, Lube, TI-Pure, #9, B.G., etc.	470
c) Locker & Snack rooms, offices	750
NOTE: Melamine - Bags	2,390#/wk.
Urea - Bags	1,750#/wk.
6. MISCELLANEOUS	
a) Scrap & Disposable pallets, C.R. , M.C.	2,700
b) Boxcar blocking, dunnage, mat'ls handling	500
c) Boiler house, maint. bldg., yard	150
7. SYLVAN	
a) Urea bags and pecan shell flour	500
b) Locker room, lab, office, misc. scrap	200

? 7. Fly Ash (3 T/L week) summer TOTAL 12,465
(5 T/L week) winter

8. Molding Compound scrap

5000

I. E. Dept.
ME4/mhh

450131

F 4346
SEARCHED SERIALIZED
6164

B. TOLEDO, OHIO FACILITY ("TOLEDO FACILITY")

I. WATER

a. National Pollutant Discharge Elimination System (NPDES) Permit

Allied submitted applications (No. OH 070 OX 5-2-710637) to the U. S. Army Corps of Engineers on June 30, 1971, revised April 27, 1972, for discharge of uncontaminated cooling water, steam condensate, and storm runoff contaminated with ammonia-nitrogen into Delaware Creek, a tributary of the Maumee River. An NPDES Permit (No. OH 0033731) for this discharge, effective March 8, 1974, and expiring on February 28, 1979, was issued to Allied by the U.S. Environmental Protection Agency, Region V ("USEPA V").

The permit was subsequently administered by the Ohio Environmental Protection Agency (OEPA). On August 25, 1978, Allied submitted to the OEPA an application for renewal of NPDES Permit OH 0033731 on OEPA Short Form R for NPDES Permit OH 0033731. The OEPA acknowledged receipt of the application by letter, dated January 24, 1979, and advised that the then current permit conditions would remain in effect until a new permit was issued.

A new permit (OEPA Permit No. F-200*BD) was issued June 17, 1980 by the OEPA to Plaskon Products, Inc. (Attachment "A"). In June, 1983, the OEPA notified Plaskon Products that the old Permit Number F200 was being changed to the new Number 21F00000 and that, coincident with the new number, the station code I.D. Number was being changed from F200001 to 21F00000001 (Attachment "B").

On September 13, 1983, the Company requested that the OEPA change the name of NPDES Permit No. 21F00000 from Plaskon Products, Inc. to that of the Company (Attachment "C"). The OEPA acknowledged that this change was made September 22, 1983 (Attachment "D").

b. Discharge to Toledo Water Reclamation Department

Sanitary and process wastes from the Toledo Facility are commingled and discharged into the municipal treatment system operated by the Water Reclamation Department, City of Toledo. Monitoring of this discharge for chemical oxygen demand (COD) and pH is performed on composite samples collected twice a week. The COD and pH results are reported quarterly to the Commissioner, Water Reclamation Department,

for sewer surcharge billing purposes as specified in the Toledo Municipal Code, "Regulations" Governing Sewer Use, Industrial Wastes and Surcharges." The Water Reclamation Department also obtains both a grab and twenty-four hour composite sample on a quarterly basis. In the most recent report dated June 13, 1984 for the period March 1984 through May, 1984 (Attachment "E") the reported discharge average values were 33 ppm COD and 7.3 pH units. None of such reported average discharges exceeded the permissible levels pursuant to "Regulations Governing Sewer Use, Industrial Wastes and Surcharges" as specified in the Toledo Municipal Code.

In the event of a major spill or increase in the concentration of organic pollutants, the Toledo Facility has the capability to stop discharges in the sanitary sewer system and divert the wastewater into a 60,000 gallon capacity above-ground holding tank. This tank, installed in 1967, is capable of retaining several days of wastewater flow under normal plant operating conditions. These systems were installed primarily to reduce the risk of shock loads to the municipal sewage treatment system. Some of the more significant past discharge incidents were: a) a discharge into the municipal sewer of phenolic resin and distillate wastes, containing approximately 1700 lbs. of phenol, on June 7, 1963, b) a discharge in excess of 4,000 lbs. of phenol into the sanitary sewer system on February 15, 1965, c) a discharge of approximately 5,000 lbs. of 50% formaldehyde into the municipal sewer system on July 19, 1965; and d) a discharge of an estimated 500-700 gallons of isodectyl alcohol into the municipal sewer system on February 4, 1970. There were other discharges prior to and during this period, but there have been no other major discharges reported since the construction of the holding tank in 1967 except as described herein.

As part of the closure of the amino plant and disposal of various waste materials, dilute formalin and dilute caustic solution were discharged to the municipal sewer system. Before these solutions were discharged, Water Reclamation Department was notified and its approval was obtained. During this period of nonstandard discharging, increased sampling and analysis of the effluent stream for formaldehyde content was instituted. This period of nonstandard discharge is covered in two reports dated March 26, 1984 and December 7, 1983 for the periods December 1983 through February 1984 and September 1983 through November 1983, respectively (Attachment "F").

It is recommended that Buyer not discharge wastes into the Toledo Water Reclamation District until it makes the

necessary notifications and arrangements with municipal authorities.

c. Spill Prevention Control and Countermeasure (SPCC) Plan

The Toledo Facility SPCC Plan required by 40 CFR Part 112, initially certified on June 11, 1974 and revised September, 1979, has been implemented. An inspection on August 23, 1983 by the USEPA confirmed that this plan conforms to the requirements of 40 CFR Part 112 (Attachment "G"). A new SPCC Plan to simplify the plan in accordance with the decrease in the generation of liquid wastes by the Toledo Facility since the discontinuation of urea-formaldehyde manufacturing operations is currently in preparation (Attachment "H"). There have been no reportable oil spills from this facility since the effective date of federal regulations (January 10, 1974).

The OEPA is currently investigating an allegation made by a former employee that in the 1950's a predecessor operator of the Toledo Facility released hazardous wastes into the Delaware Creek. While Plaskon Products was notified by Allied that involuntary spills had been made at various times in the past, it has no knowledge of any spills conforming to the description contained in the complaint. On May 17, 1984 Mr. David Fergusson of the OEPA made a preliminary investigation of the sewer system and sewer outfall into the Delaware Creek and notified the Company that he intends to continue the investigation into this spill in the future.

II. AIR

a. Air Permits - Processes and Process Emission Sources

The Toledo Facility currently has twenty-five (25) permitted or registered "air contamination sources." Four (4) additional permits for the package boilers installed in the fall of 1983 are pending (Attachment "I"). On September 13, 1983, the Company submitted a request to the Toledo Environmental Services Agency to transfer from Plaskon Products, Inc. to the Company permits for the operation of equipment used by the Company (Attachment "J"). An extensive reduction and resultant modification of this current system, which will ultimately reduce the number of existing permits and registrations to thirteen (13), is in progress (Attachment "JJ"). Administratively, this reduction in existing permits must be performed by the OEPA prior to the transfer of permits.

b. Boiler Permits and Emission Limitations

Prior to 1983, three large boilers were available for the generation of steam. Boilers No. 1 (OEPA Permit to Operate 044801U071-B001) and No. 2 (OEPA Permit to Operate 0448010071-B002) are rated at 24mm BTU/hr. heat input. Boiler No. 3 (permit to operate 0448010071-BU03) is rated at 55 mm BTU/hr. heat input. Under the permits, flexibility exists to operate these boilers with either coal or oil. Applications for renewal of these boiler permits, which were due to expire in mid-1983, were submitted in December 1982 and January 1983. Although these permits were subsequently renewed (Attachment "K"), the renewed permits specify several new terms and conditions for boiler operations, including a requirement that the boilers undergo a "stack test" to review boiler emissions prior to usage. The large boilers were shut down in May 1983, prior to the expiration date of the old permits, and have not been restarted. The permits are being maintained solely to operate the boilers under certain "grandfather" provisions of local law, as the boilers would not otherwise be permitted to operate under current law.

Before the renewals of these permits were actually issued, it was determined that the requirements for steam could best be met by the installation of four (4) new package boilers. These boilers operate on either gas or oil. Applications to install and operate the four (4) new boilers were filed in September 1983 (Attachment "I"). Final issuance of the permits to operate these package boilers is pending, and the boilers are being used on an interim basis until the permits are granted.

III. SOLID AND LIQUID WASTE DISPOSAL

a. Toledo Facility Status under Resource Conservation and Recovery Act ("RCRA")

Plaskon Products, Inc. applied for a permit as a hazardous waste storage facility under RCRA on October 30, 1980 (Attachment "L"). A revision to the original application was submitted November 12, 1980 (Attachment "M"). An additional revised application was filed September 8, 1981 (Attachment "N"). The USEPA granted Plaskon Products, Inc. interim status as a hazardous waste management facility May 19, 1982 (Attachment "O").

After the discontinuation of the urea-formaldehyde molding compound business of Plaskon Products, that company initiated closure proceedings with the USEPA and the OEPA, with respect to the portion of the plant that had been used in

the urea-formaldehyde operations. These proceedings require the removal of all hazardous waste generated in that portion of the Facility and the inspection of such portion of the facility to ensure that the disposal of the hazardous wastes was complete. At present the removal of the wastes has been completed, that portion of the Toledo Facility has been inspected by independent professional engineer who has certified that Plaskon Products has properly disposed of the wastes and has completed the partial closure of the Toledo Facility and the OEPA has sent an inspector to the facility and has certified that no hazardous waste was found in that portion. At present Plaskon Products is awaiting final disposition of the matter from the USEPA and the OEPA.

Also in connection with the discontinuation of the urea-formaldehyde molding compound business of Plaskon Products, the Company has applied for a modification of its permit status to eliminate the need for a hazardous waste storage facility permit under RCRA and replacing such status with generator status under RCRA. Currently Plaskon Products is in the process of transferring its RCRA registration to the Company. Under RCRA, the Company's operations would be classified as small generator status and the Company has notified the OEPA that it intends to be classified as such but will maintain all the necessary paperwork and meet all requirements for generator classification.

Mr. J. D. McKee, a consultant, was retained to coordinate both the closure of the urea-formaldehyde portion of the Toledo Facility and the change in status under RCRA. He has recently summarized the progress in this area in a report dated June 8, 1984 (Attachments "H", "P", "Q", "R", "S", "T", and "U"). Formal notification from the OEPA that the change in the status of the Toledo Facility has been accomplished is pending.

b. Current Offsite Disposal

Certain plant solid wastes (pallets, paper, fiber drums, and scrap thermoset molding compounds) are commingled and hauled by Seller to the Westover Municipal Landfill, Oregon, Ohio. Approximately 80 cubic yards per week of this type of waste are generated. Previously, when No. 3 boiler was operated with coal, an estimated 20,000 pounds/week of flyash was hauled to Westover Landfill for disposal.

Leachate analyses performed by the Jones & Henry Laboratories on representative epoxy molding products (Mix #6, 7 and 8) reported July 11, 1980 and a reanalysis of Mix #7 type product reported October 21, 1980, indicated that these

materials are not deemed to be hazardous based on federal regulations promulgated under the provisions of the Resource Conservation and Recovery Act (Attachment "V"), and the Company presently intends to continue to dispose of such materials at the Westover Municipal Landfill.

New plans and procedures are currently being developed for disposal of both hazardous and nonhazardous waste generating by the operations of the Company. The simplified procedures will be in compliance with the pending generator status referred to above (Attachment "H"). The two common types of wastes that will be produced on a continuing basis are a mixture of waste laboratory solvents and mixed lubricating/hydraulic oils.

As part of the routine quality control testing of epoxy molding compound, as much as one hundred (100) gallons/month of acetone solution are generated. Recently, the recovery and recycling of acetone by the distillation of this solution has been started. The regulations promulgated under the Resource Conservation and Recovery Act define still bottoms from acetone recovery as a hazardous waste, F-003. Based on the specific nature of this residue, the OEPA has been requested to exempt the solid material generated by the distillation from the F-003 hazardous waste definition (Attachment "W"). Pending granting of this exemption, the residue is being treated in compliance with hazardous waste regulations.

In February 1983, a 1000 KVA General Electric transformer (Serial No. 857512) containing 380 gallons of Pyranol (PCB) failed. A purchase contract for the disposal of this transformer, which is in compliance with EPA Regulation 40CFR, Part 761, is pending with the ILWD Corporation.

Polychlorinated Biphenyls (PCB's) are present in electrical switch gear, capacitors and service transformers for the Toledo Facility. PCB containing transformers and capacitor banks have been inventoried, labeled and are inspected quarterly in accord with EPA regulation 40 CFR 761. The most recent annual PCB report and quarterly inspection report contain specific details (Attachment "X"). As well as the failed transformer currently being disposed (Section III(b)) another PCB containing transformer failed and was disposed of by Chemical Waste Management, Inc., Emelle, Alabama in 1982 (Attachment "Y").

A collection of chemical wastes was disposed of at Chemical Waste Management Landfill in the fall of 1980. Due to the ignitability or composition of these materials they were all considered as hazardous wastes (Attachment "Z").

In conjunction with the closure of the urea-formaldehyde manufacturing operations and the pending change to generator status, a variety of wastes were disposed of in the first half of 1984. The attached report dated June 8, 1984 by the consultant, J. D. McKee, retained to coordinate these activities, summarize the disposition of these wastes (Attachment "H").

c. Prior Off-Site Disposal by Allied

From about 1971 to 1977, small quantities (5-6 gallons/day liquid acetone/epoxy wastes were collected in drums and pails and hauled by contractor, J. L. Spradlin, to the Evergreen Landfill, Wood County, Ohio. Subsequently, upon internal review, it was ascertained from the OEPA that the Evergreen Landfill was not authorized to dispose of liquid wastes or sludges. In January, 1977, disposal at Evergreen Landfill was terminated.

On May 25, 1977, in response to an inquiry, Allied advised Dr. J. F. Finles, Director of NIOSE, that no polybrominated biphenyls were on site. This response was amended on September 7, 1977 when approximately 100 pounds of Firemaster BP-6 (Michigan Chemical's polybrominated biphenyl) was found on-site. The polybrominated biphenyl material had been used in 1974 to produce a small quantity of experimental molding compound. Unused BP-6, received from Michigan Chemical, was resold to the Samuel Moor Company, Aurora, Ohio. The residual 100 pounds of BP-6 found on-site was shipped off-site for disposal at Nuclear Engineering Co., Sheffield, Illinois.

In 1977 after the plant had discontinued use of benzidine yellow pigment and in response to a Section 114 request from USEPA, Allied stated that approximately 20 pounds of such pigment would be removed and incinerated by ChemDyne, Hamilton, Ohio. However, this material was disposed of at the Nuclear Engineering Company, Sheffield, Illinois.

Particulate matter, removed from certain dust collectors, probably contained small quantities of asbestos. This material was comingled with other plant trash and landfilled at the Westover Municipal Landfill. Use of asbestos as a filler in molding compound manufacture was discontinued in late 1977. Unused asbestos, approximately 28 pallets, was covered with plastic sheeting, properly labeled, and disposed of at the Westover Municipal Landfill in Oregon, Ohio. The landfill operator covered the material immediately after dumping.

d. On-Site Disposal Since July 10, 1979

There are no records indicating that any on-site disposal of hazardous wastes has occurred at this Facility to the best of the knowledge and belief of the Company.

e. On-Site Disposal Prior to July 10, 1979

Manufacture of phthalate esters at Allied's Toledo plant was terminated in 1970. The ground in process areas of the plant may contain minimal quantities of various materials used in manufacturing operations. Allied has stated that an area of contamination may be the former phthalate ester operations. Runoff from this area is processed through an underflow below ground oil/water separator before discharge into the municipal sewer system. Accumulated sludges and esters were last removed from the oil/water separator in 1977. The degree of residual contamination of the ground and/or storm-water runoff is unknown, but Allied has stated that it is believed to be minimal.

Use of an on-site settling pond for scrubbing water from the Rotoclone Scrubbers was discontinued in 1971 when a new dry particulate collection system was installed. Settled amino molding compound was removed from the unlined pond and landfilled off-site. The basin was then backfilled with earth and seeded. The extent of any contamination from molding compound that remained after cleaning is unknown; but Allied has stated that it is believed to be minimal.

IV. OTHER CONSIDERATIONS

In 1953 Allied purchased the site from Libbey Owens Ford. Plaskon Products, Inc. purchased the site in 1979. In 1983, Plaskon Products entered into a lease for the portion of the site used by the Company in its operations.

Prior to 1978, asbestos was used as a filler in certain molding compounds at this site.

1957- 65
'60

- any report on wastes 1960's
- anything at all Dura
- any lab reports on wastes (analyses)
- any reports of env. incidents in 60's